

Spectrum Framework Review: the Public Sector consultation Response of the Royal National Lifeboat Institution

The Royal National Lifeboat Institution is a principal provider of search and rescue from 233 lifeboat stations and over 71 RNLI lifeguarded beaches around the coast. This response therefore represents a substantial part of the search and rescue infrastructure of the United Kingdom.

In responding to the Spectrum Framework Review, the Royal National Lifeboat Institution does so on the grounds of maintaining safety and security, which are essential factors in the protection of existing and future spectrum allocations for the safe and efficient conduct of SAR missions.

The RNLI would also like to make it clear that whilst the consultation is about the public sector it nevertheless impacts on the private sector particularly in relation to the use of spectrum for the conduct of safe operations within the maritime industry, within both the commercial and leisure sectors.

The RNLI supports the concept of spectrum efficiency but only where this does not impact on the safe conduct of maritime operations.

The consultation questions are answered as follows:

Question 1: Do you agree with Ofcom's proposed overall approach to improving the management of public sector spectrum holdings and, in particular, with Ofcom's conclusion that it will generally be preferable for public sector bodies to interact directly with the market?

Answer: The RNLI supports the concept of improved spectrum efficiency with the caveat that any changes do not interfere with existing frequencies that are used for SAR communications and navigation systems.

Question 2: What factors do you consider Ofcom should take into account in determining the programme of reform in the framework for managing public sector spectrum holdings?

Answer 2: The RNLI considers that the following should be taken into account;

- **Safety**
- **Security**
- **Social and economic factors**
- **Interests of stakeholders**
- **Financial impact on SAR agencies – particularly those that operate as a charity, whether land sea or air.**
- **Reduction in processes and paperwork for compliance**
- **The need for a full impact and safety assessment.**
- **The costs to all users associated with changes to equipment**

- **Interference through over subscription of areas of spectrum bandwidth.**
- **Effects on other national and international administrations**

Question 3: Do you consider that the proposals should be phased in?

Answer 3: YES but must include a review period after each phase is introduced to re-assess risk and impact and adjust accordingly.

Question 4: Do you agree with Ofcom's proposals about the frequency bands that offer the greatest potential benefits from band sharing? Are there other frequency bands where the facility to trade or lease spectrum from public sector bodies would be particularly attractive?

Answer 4: YES – provided that any changes do not have a negative impact on safety to users of the spectrum.

Question 5: Do you agree with Ofcom's proposed approach to awarding public sector licences and RSA?

Answer 5: No Comment

Question 6: Should public sector spectrum trading be introduced at this stage in the Channel Islands and the Isle of Man?

Answer 6 : That is a matter for the relevant administrations of the Isle of Man and Channel Islands. The RNLI's position would remain as explained within this document if OFCOM were to proceed with these measures in the Isle of Man and Channel islands.

Question 7: Should there be additional grounds, eg safety-related, for Ofcom to refuse consent to a proposed trade in certain frequency bands or for certain applications?

Answer 7: OFCOM should maintain the right of refusal particularly where safety and security would be affected.

The RNLI looks forward to further consultation and active involvement where appropriate.