



**BT Response to the Ofcom consultation on:
"UK Broadband application for licence variation"**

(Issued by Ofcom on 18 June 2007)

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BT has reviewed Ofcom's consultation on the proposed variation of the terms of the licence for Public Fixed Wireless Access issued to UK Broadband under the Wireless Telegraphy Act 1996.

Whilst we do not wish to directly comment on the merits of this specific case, nor provide opinion on the submission made by UK Broadband, we take this opportunity to provide comments of a more general nature.

We note that the position Ofcom has taken is consistent with the policies articulated previously in the Spectrum Framework Review and the Spectrum Liberalisation consultations and statements. We continue to support these national spectrum management policies and note that they align with the direction taken in the European Commission on promoting more flexible spectrum management.

In general we would urge Ofcom to continue to accelerate its efforts to implement the policies outlined in its spectrum framework review and to proceed with liberalisation and spectrum trading across all bands as soon as possible.

Finally, on one small point of detail we note that provision S21.5 of the ITU Radio Regulations is mentioned on Page 17 as the basis for limiting the power into the antenna of a station to +13dBW. We note that this comes from a CEPT document, but we would highlight that provision 21.5 needs to be read in conjunction with provision 21.6, which to our understanding means that the +13dBW limit only applies only to bands shared with co-primary services that operate receiving space stations (the band in question is not one of these).
