



The Response of Motorola Ltd
to the
Consultation on the UK Broadband Application for Licence Variation

Motorola is grateful for the opportunity to contribute to the consultation on the UK Broadband application for variation of their spectrum licence.

Question:

Do you agree that the case for making changes requested by UK Broadband to its licence has been made? If not, why would it not be appropriate to vary UK Broadband's Wireless Telegraphy Public Fixed Wireless Access Operator Licence by (i) allowing application neutrality and (ii) increasing the permitted maximum in-band EIRP, and why would it not be appropriate to vary the licence as soon as practicable?

Motorola has reviewed the documentation presented by UK Broadband and the consultation and finds itself in general agreement with Ofcom that there seems no reason why the licence should not be varied in the manner requested by UK Broadband.

UK Broadband's request of varying their licence comprises (in principle) of 3 points:

- 1) Allow technology and application neutrality**
- 2) Increase the permit in-band power limits**
- 3) Varying the out-of band emission limits**

For the first two points Motorola is in full agreement with OFCOM that UK Broadband's license should be varied by their request.

On the out-of band emissions, however, Motorola supports UK Broadband's request that it would be appropriate to align the UK regulations with the European level recommendation in the form of ECC DEC(07)02, ECC(04)05 and Report 100. We believe that the out-of band emissions specified in REC(04)05 and EN 302 326-2 are sufficient for the co-existence of BWA system and protection of other systems in this band. Several studies within CEPT (studies performed in SE19 last year, Report 100) already justified the present European regulations.

We have also to highlight that more stringent requirements only for one single market (like UK IR2015) would lead to higher equipment costs for this market. Therefore, Motorola would appreciate any harmonisation across Europe to use the same equipment in all European countries.

Furthermore, Motorola would appreciate that any variation to UK Broadband's licence should be made as soon as possible.

In conclusion, Motorola fully agrees with UK Broadband's request and supports all points of their request to vary their 3.5 GHz licence.

Questions and comments regarding this response should be addressed to T. Cull in the first instance

T. Cull
Motorola Ltd.
Jays Close
Basingstoke
Hants
RG22 4PD