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Name and title under which you would like this response to appear:

Regulatory Manager

Representing:

Organisation

Organisation (if applicable):

Samsung Electronics UK

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What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Question 1: 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?:

Samsung Electronics UK agrees that the case has been made to vary the terms of UK Broadband's licence in the UK.

Samsung Electronics UK is an active member of the WiMAX Forum and has a considerable interest in the opportunity that IEEE 802.16e based, WiMAX Certified technology represents for consumers who demand ever more mobile access to broadband applications and services.

Samsung Electronics UK supports the recent European developments that have resulted in a regulatory framework that allows the possibility for mobile terminal devices in the 3.5GHz frequency ranges. However Samsung also recognises that there are further developments and refinements ongoing that could have implications on the final technical conditions applicable to this licence:

1) As the consultation document recognises, there is currently no specific harmonised ETSI standard for mobile terminal devices in the 3.5GHz band. However there is already a work item underway in the ETSI BRAN committee to develop a technical report (Draft ETSI TR 102 742 BRAN51d025r1) that examines the appropriate characteristics for mobile terminal devices in this band that may result in development of a specific standard. This means that the requirements on EN302 326-2 (as cited in section 5.10 of the consultation document) may not be directly relevant to the operational scenarios and device form factors that would support mobile applications. Therefore Samsung Electronics UK suggest that compliance with EN302 326-2 for mobile terminals should not be a mandatory licence stipulation.

2) Referring to section 5.10 of the consultation document, Samsung Electronics UK is surprised to see that compliance with the ETSI standard seems to be proposed as a mandatory licence condition. ETSI Harmonised standards are not the only route for a manufacturer to declare compliance with the essential requirements of the RTTE Directive. Therefore it is inappropriate to place a licence condition on UK Broadband that may require them to insist on EN302 326-2 compliance especially considering the issue discussed in point 1 above.

3) Samsung Electronics UK notes the references to ECC Recommendation (04)05 regarding the block edge conditions and the decision at this time not to amend the block edge conditions of the UK Broadband licence. However Samsung Electronics UK is concerned that neither the current block edge requirement nor the ECC Recommendation based requirement lead to efficient utilisation of the assigned spectrum when considering the declared WiMAX technology deployment ambitions:

a) It is not clear whether there has been any consideration of either a guard channel outside the assigned blocks or internally within the assigned blocks as considered in

ECC Recommendation(04)05. Guard frequency is a key element to the balance between minimising interference levels and the need for enhanced equipment performance at block edges. Samsung Electronics UK believes that the correct interpretation of the ECC Recommendation(04)05 (assuming guard frequency is external) would be to apply the block edge mask at a point that is x MHz outside the existing 20MHz block edges. The value of x may need some investigation.

b) A principle objective of the block edge mask developed in ECC Recommendation (04)05 is to provide a means for regulators to assign adjacent frequency blocks to geographically co-located operators in the same service without the need to specifically regulate details of the technologies they may wish to deploy. In this consultation the block edge mask is proposed between a wireless access service and the PMSE service. Samsung Electronics UK is not sure that such stringent requirements are relevant for this inter-service scenario considering the sporadic and temporary nature of PMSE use in these frequencies.

Comments: