

Title:

Ms

Forename:

Patricia

Surname:

Campbell

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

Ms Patricia Campbell

Representing:

Organisation

Organisation (if applicable):

Sinon Ltd

Email:

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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?:

Jo Sonke
Ofcom

Dear Sir,

Consultation: UK Broadband application for licence variation

Sinon Ltd agrees with Ofcom's conclusions in respect of Items 1 (mobility) and 2 (power increase) of UK Broadband's (UKB) application.

Increased competition in the broadband market will lead to improved customer provision, in terms of services provided, service quality and cost. Sinon supports Ofcom's statement that Since the 2003 auction the broadband market and technology have changed significantly, and maintaining the restrictions on service provision and power limits within UK Broadband's licence is unjustifiable. As declared by Ofcom, the variations requested by UKB are likely to result in economic benefits, including increased scope for innovative use. Equipment is now available that was not in 2003, and it is reasonable that the licence conditions should be varied to reflect this.

The 3,5GHz band licensed to UKB is now recognised by ECC Decision (07) 02 as a mixed application band, in which mobile operation is allowed. The WiMax Forum is considering profiles for the 3,5GHz band which will be broadly similar to the 2,5GHz band, including mobility. Furthermore, Ofcom has made an input to WRC identifying 3,5GHz as a mobile band in response to the ITU's view that there will soon be a scarcity of mobile spectrum. Therefore Sinon supports the decision to allow UKB mobility.

The 2003 conditions leading to the in-block EIRP limit of +14 dBW/MHz no longer apply. UKB's licence covers all relevant regions and inter-operator interference does not apply. Sinon agrees that the power level requested is broadly in line with the limits that apply internationally to the base stations of mobile networks; and that the lower EIRP level for mobile terminals will offset the effects of the higher base station EIRP. Therefore Sinon supports the increase of maximum in-block EIRP to +29 dBW/MHz.

Ofcom recommends postponement of UKB's third request which is for an alignment of the 3,5GHz out-of-band emissions with those at 2,5GHz. Sinon believes that such an alignment would result in a significant increase in spectrum efficiency, a key objective of Ofcom, and improved equipment production costs. Nevertheless, we agree that ongoing work in SE42 on WAPACS makes it inappropriate to make such a change immediately. Sinon urges Ofcom to use the opportunity of the SE42 work package to support actively the case for the alignment of the proposed Block Edge

Masks.

Thankyou for the opportunity to respond on this issue.

Yours faithfully

Patricia Campbell
Director

Comments: