

Title:

Mr

Forename:

John

Surname:

Mettrop

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

Mr J Mettrop

Representing:

Organisation

Organisation (if applicable):

Civil Aviation Authority

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 spectrum commons model should be the preferred approach for licence-exempt use of spectrum, and that application-specific allocations should only be considered where technical constraints or safety issues require this?:

The CAA do not have an opinion on this provided that licence-exempt use, either co-channel or adjacent band, of spectrum is not allowed within bands allocated to safety of life services without having undertaken the relevant sharing studies. This approach is supported by the Independent Audit of Spectrum Holdings

Question 2: Do you agree with the proposal for multiple classes of spectrum commons?:

Again provided this is not applied to frequency bands where safety of life services operate the CAA does not have an opinion on this.

Question 3: Do you agree with the distinction made between the licence-exemption and light-licensing regimes?:

The CAA agrees with the distinction but is concerned whether restrictions placed through light licensing can be enforced in reality

Question 4: Do you agree with the view that the licence-exemption and light-licensing regimes will converge in the future?:

The CAA sees no need for convergence.

Question 5: Do you agree with the proposed mixture of licence-exempt and light-licensed use of the 105-275 GHz spectrum? Do you agree with the bands that have been identified for such use?:

Whilst the CAA does not currently have an interest in these bands we would wish to see that use of this spectrum for scientific purposes should be protected.

Question 6: Do you agree with the view that the use of the 275-1000 GHz spectrum should be licence-exempt?:

Whilst the CAA does not currently have an interest in these bands we would wish to see that use of this spectrum for scientific purposes should be protected.

Question 7: Do you agree with the view on the levels of future demand for licence-exempt usage in the 40-105 GHz spectrum? Do you agree that the Group-A bands identified above should be considered for licence-exempt use? Do you agree that licence-exempt and light-licensed use of the Group-C bands identified above should only be considered when there is evidence of demand for such use?:

Whilst the CAA does not currently have an interest in these bands we would wish to see that use of this spectrum for scientific purposes should be protected

Question 8: Do you think it could be desirable for transmissions at levels below certain power spectral density limits to be exempt from licensing?:

The CAA would not support the license exempting of devices producing a power spectral density below certain limits. Measurement campaigns have shown that the impact on the reception of wanted signals by interferers is dependant on a number of factors including but not exclusively limited to the power spectral density limit.

Question 9: Do you agree with the transmission limits proposed in this document?:

The CAA does not agree with these limits as they are based on those determined for UWB which were compromise levels agreed on the basis of the use of the technology and not on the absolute protection limits required.

Question 10: Do you agree with the harmonisation strategy discussed above in the context of licence-exempt device?:

The CAA would agree with this strategy

Question 11: Do you agree with the view that no additional regulatory instruments, beyond those available today, are required for the protection of licence-exempt equipment:

The CAA agrees

Comments:

Overall the CAA are concerned that any implementation of License does not affect the provision of safety of life services. Additionally the CAA would be interest in how Ofcom would propose to remedy any situation where License exempt devices caused interference to existing services, the timescales for such action and how it could be ensured that the situation did not occur again in the future and how Ofcom would meet the UK's obligations under the radio regulations