

Title:

Mr

Forename:

Nick

Surname:

Long

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

Nick Long

Representing:

Organisation

Organisation (if applicable):

Great Circle Design

Email:

nick@gcd.co.uk

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?:

Yes. The question of safety related applications in licence exempt spectrum needs further consideration; possibly this is a case for a specific area within spectrum commons.

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

Yes. This is essential in order to make it accessible to a wide range of users on an equitable basis. But the difficulty of achieving this should not be under-estimated. It will be necessary to develop the tools and expertise to design and manage the classes.

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

Yes

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

Yes. But I am concerned that this may lead to
a) regulators having inadequate knowledge of the use of the spectrum
b) a lack of policing.

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?:

No opinion

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

No opinion

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?:

No opinion

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

Yes. It would appear inconsistent to allow UWB and not to allow this. It could also be inconsistent with the EMC regulations - a device could be permitted to "accidentally" radiate more than it may "intentionally" radiate.

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

In general, yes. But certain frequency bands may need special treatment

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

Yes

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:

Yes

Comments: