

Title:

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Forename:

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Page

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

Manager, Radio Regulations

Representing:

Organisation

Organisation (if applicable):

Nokia

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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?:

Not necessarily. Using the methodology in the consultation (and the research in Annex 6) there could be other reasons why in some instances application specific allocation would be more economically efficient.

Section 3.1.2 indicates a preference to sell even licence-exempt spectrum. However there is an obvious benefit to 'cost free' spectrum that has not been listed in 3.4.1, namely that lower end-user prices will increase use (reducing overall use and economic benefit.)

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

Yes

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?:

Only to some extent. Some of the reasons for light-licensing given will not be helped by technical advances.

Furthermore automatic co-ordination may be technically possible but not universally used (and in some case it may not be justified to make it mandatory.)

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?:

It may be prudent to keep some Group 1 spectrum 'in reserve'. While it will not be scarce in the near future, in the long term applications may emerge which benefit from the absence of other users. There appears to be no downside in keeping some Group 1 spectrum for such licenced (or perhaps light-licenced) use.

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

It may be prudent to keep some spectrum 'in reserve'. In the long term applications may emerge which benefit from the absence of other users. There appears to be no downside in keeping some spectrum for licenced or light-licenced use.

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?:

Yes

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 in theory. However Ofcom should consider the difficulties of enforcement and measurement. If regulations/limits are not enforceable limits may be exceeded routinely (which in aggregate, could be harmful to overall capacity.) Therefore it might be better to only exempt certain bands (eg 3.8-10.6GHz which have been thoroughly examined for UWB use.)

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

Yes, but see above.

Note also that regarding the text above Fig 7, the high powers used by licence exempt devices in certain bands does NOT indicate that much lower values used in other, perhaps more sensitive, bands will be without problem, which is implied here. Devices in 2.4GHz etc are designed to cope that environment.

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

One benefit of harmonisation of frequency bands not listed here is the increased competition between service providers (using licence-exempt frequencies such as 2.4GHz) bringing reduced costs and greater use.

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:

With increasing liberalisation (trading, increasing power levels through licence changes etc) there is a new risk to licence-exempt devices from adjacent bands. Ofcom (or the applicants?) needs to consider this when considering 'change of use' applications.

Comments: