

**Q1: 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?**

OSCA agrees with this approach for services that do not require a high quality of service for interference and / or response time (i.e. car keys, RFID). For services that require a higher QOS we believe that application specific allocations should be made if there is sufficient spectrum supply (i.e. DECT, Bluetooth).

OSCA also advises that many manufacturers work within a worldwide marketplace and that application specific allocations might be more suitable for manufacturing cost control. For this reason Ofcom should take advice from manufacturers who operate within these markets for particular technologies.

**Q2: Do you agree with the proposal for multiple classes of spectrum commons?**

OSCA Agrees with Ofcoms proposal for multiple classes of spectrum commons subject to the points made in Q1 above; that protocol politeness rules are applied and maintained; that radiated power levels are limited and transmitter filter masks are applied..

**Q3: Do you agree with the distinction made between the licence-exemption and light-licensing regimes?**

OSCA agrees with Ofcoms distinction made between the licence-exemption and light-licensing regimes. However, we would strongly emphasise the point made by Ofcom that protection must continue to be afforded to existing users of the bands.

OSCA also emphasises that the regulator must be able to quickly become directly involved in the co-ordination of the radio links if a dispute were to arise between operators and/or other users.

**Q4: Do you agree with the view that the licence-exemption and light-licensing regimes will converge in the future?**

In principle OSCA agrees that some (but not all) services and applications may be able to move from a light licence to licence exempt. This should only happen after consultation with all users, operators, service providers and manufacturers who have an interest in any band that is being targeted for conversion. In addition Ofcom should give long term guarantees that conversion from light licensing to licence exempt will not have a detrimental effect on existing users. Ofcom should also be prepared to revert to light licensing for the band if existing users are subjected to interference that damages their services or operations.

**Q5: 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?**

OSCA has no view on this.

**Q6: Do you agree with the view that the use of the 275–1000 GHz spectrum should be licence-exempt?**

OSCA has no view on this.

**Q7: 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?**

OSCA has no view on this.

**Q8: Do you think it could be desirable for transmissions at levels below certain power spectral density limits to be exempt from licensing?**

OSCA agrees that transmissions at levels below certain power spectral density limits may be exempt from licensing if they transmit in a band that is already licence exempt. OSCA believes that such equipment should not be allowed to operate in bands that are subject to any form of licensing.

If popular licence exempt equipment is introduced in licensed bands there would be a high risk of interference to existing users caused by an increase in the noise floor due to high numbers of the product and the length of time it is used.

OSCA would point out that Ofcom has a duty to provide a reasonable quality of service to users of the spectrum.

**Q9: Do you agree with the transmission limits proposed in this document?**

OSCA agrees that transmissions within the limits proposed may be exempt from licensing if they transmit in a band that is already licence exempt. OSCA does not agree that such equipment should be allowed to operate in bands that are subject to any form of licensing.

**Q10: Do you agree with the harmonisation strategy discussed above in the context of licence-exempt devices?**

OSCA agrees with the harmonisation strategy proposed in the document. OSCA fully supports the view that any harmonisation should impose a minimum of restrictions for operators, service providers and manufacturers in the UK.

**Q11: Do you agree with the view that no additional regulatory instruments, beyond those available today, are required for the protection of licence-exempt equipment?**

OSCA does not foresee that any additional regulatory instruments, beyond those available today are required for the protection of licence-exempt equipment. However, we would point out that there is a risk that as licence exempt products become more popular, are used more, and are used in the more popular licence exempt bands, there could be considerable in band interference and Ofcom might then be obliged to deal with such a situation.