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?

Generally, yes, although utilizing a commons approach could impinge upon the potential usefulness of the band. If, for example, power limits are set relatively low to minimize the chances of interference, it may prove counterproductive, putting barriers in the way of product development.

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

Yes, as this may provide a mechanism for various types of application to utilize similar spectrum while minimizing inter-operability problems.

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

I agree. I would also state that while there are obvious distinctions to be made (and generally Europe holds similar views), there may be potential for lines to be blurred immediately in terms of regimes used within bands. For example, in an ITS environment fixed services may wish to use a band for point-to-point links to mobile devices *and* mobile device to mobile device comms. Some form of protection is desirable for the point-to-point links but is totally impractical and would prove detrimental to the commercial viability of any mobile service. Thus, exempting mobile devices that work with the fixed service would be logical. In this way I believe that the two regimes are not mutually exclusive. Where difficulties would be encountered, and where such sharing should be avoided, is in situations where fixed and mobile systems are not intended to interact, and may therefore interfere with each other. To this end it may be appropriate to create a regime with light licensing for fixed services and license exempt for mobile simultaneously in bands with a use such as ITS in mind, eg. RTTT at 63-64 GHz.

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

Yes. In the meantime, I believe that while technology is not sufficiently ‘cognitive’ to be able to function co-operatively with other services, there is a valuable place for both forms of regime. In the future it may well be both technologically and economically beneficial to use self-regulating/coordinating devices, but that point is some years away. Until developments are made it is important to explore the different ways of implementing such regimes such that when self-regulation/co-ordination is possible it is done with the greatest certainty of efficiency and performance. To this end, interaction with Europe on such subjects as Light Licensing is critical, as is research in our own environment and consultation with Industry.

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?

No opinion.

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

Yes. As this space is currently very expensive to move into, license exemption may facilitate research and bring the potential usage of this area of the spectrum into closer proximity. Changes to regimes in this space should be made as and when required/requested.

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?

While demand for spectrum in 40-105 GHz seems not to outstrip supply in the near future, any regimes implemented now could cause problems when demand is higher. For this reason I support Ofcom's use of licensing and light-licensing for the majority of these bands.

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

No opinion.

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

No opinion.

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

Yes.

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?

Yes.