

**Question 1: Have all the possible victims of interference been correctly identified and quantified as far as possible?:** No ? the vast majority of users within vehicles and homes would be unable to use anything but the higher power system. Given that most in-car hands-free systems utilise Bluetooth these would be unusable and therefore a safety hazard in areas covered by the higher power. The law's position of stating that hands-free systems must be used with mobile phones in cars would also become untenable.

**Question 2: Have the costs and benefits been correctly captured? In particular, are the costs of interference to WLANs appropriately assessed?:** No ? the vast majority of users entering a higher power rural area would be unable to use hands-free or in-house systems. No provision has been made to solve this problem.

**Question 3: Are there any other mechanisms that could be used to restrict device operation to appropriate areas? Of the schemes set out which should be preferred?:** This has been explored previously in CEPT and ETSI work and no usable mechanism which allows continued use by "visiting" users has been found.

**Question 4: Should we move from specifying radiated power to specifying conducted power?:** However we measure the device the EIRP (which includes the antenna gain) will be the defining factor. Large powers at this frequency will cause major disruption to current users. In the case of portable devices the antenna is normally built in and therefore conducted measurements are impractical without the use of a test tube.

**Question 5: For 2.4GHz which of these options do you favour? Are there other viable options that should be considered? Or should regulations be left unchanged?:** None of the options are acceptable if present users and especially in-car systems are to continue to operate. A range of these options had been considered by CEPT in the past and rejected for all the reasons provided above.

**Question 6: For 5GHz should Ofcom increase the power to 4W EIRP at 5.8GHz in accordance with ECC Recommendation and as set out in the draft IR2007? Should Ofcom open the database for public access to facilitate coordination?:** Yes/Yes

**Additional comments:** The bands concerned have been the subject of very careful coordination and compatibility studies undertaken by CEPT, ETSI and the EC over a number of years. This work has ensured the maximum re-use of devices within small geographic areas. Inevitable interference from potential users at unacceptable levels has led to all parties rejecting previous attempts to increase powers in these bands.

Very high proportions of devices utilizing 802.xx or Bluetooth in the home, business and car environments would be overwhelmed and made unusable if they are subjected to 80W in the same bands.