

20 September 2006

Ofcom consultation on Higher Power Limits for Licence Exempt Devices

I am providing the Welsh Assembly Government's response to this Ofcom consultation.

We largely agree with Ofcom's approach and make these comments in relation to the consultation questions:

- 1) *Have all the possible victims of interference been correctly identified and quantified as far as possible?*

We think that it looks as though you have done so.

- 2) *Have the costs and benefits have been correctly captured? In particular the costs of interference to WLANs appropriately assessed.*

On the information available to us we believe that the costs and benefits have been identified.

- 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?*

We think that Ofcom's light licensing approach is the most sensible and cost effective.

- 4) *Should we move from specifying radiated power to specifying conducted power?*

We would agree with following the US approach as long as this is what the European Union is proposing to do.

- 5) *For 2.4GHz which of these options do you favour? Are there any other viable option that should be considered? Or should regulations be left unchanged?*

When considering the options for 2.4GHz we again ask that you establish what, if anything, the European Union is considering for the 2.4GHz band. We would not want UK to be different to EMI/EU standards as this could make UK a different/smaller market for manufacturers and would result in more expensive kit.

We favour the balanced option three and believe that there are no other viable options as the 5.8 GHz registration scheme already exists. We agree that regulations should be changed so that a mandatory registration scheme would be in place and a code requiring users to work collaboratively to resolve interference issues.

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 co-ordination?*

Our response is yes on both counts.

Yours sincerely

Christine Cook
eWales
Telecoms Policy