

I am responding on behalf of LPRA to your call for comments on the above ConDoc.

As stated at the joint meeting OFCOM /LPRA earlier this week , we think the document is well structured and generally puts the concerns forward constructively .

However , we feel that there is insufficient emphasis on the probable effect to SRD installations already deployed by the proposed increase in power.

In general , SRD installations at 2.4 GHz comprise video senders/ alarm scanners and are used extensively in alarm surveillance of unattended remote sites. In rural areas , these tend to be by the Utilities ie, Water treatment, Metering and Sewage treatment stations , Gas let down stations and transformer/switchyard sites and as such have highly important presence . In towns , such systems are used for Building complex alarms etc.

The installed base runs into millions, this equipment having been on the market for over 10 years.

All of these have security and insurance implications and if interfered with by higher powered external equipment, could have both security and legal implications . The current balance , between WLAN installations at 100mW eirp and SRDs at 25mW or less , is working well , after a long struggle in ETSI to determine these as levels acceptable to both industries. We would therefore oppose any move to increase power levels at this frequency.

At 5.8GHz , although the argument is similar, in practice the number of SRD systems currently deployed is very low and therefore the objection on behalf of the installed base is not sustainable , though we feel there may be a case for an increase in the output power allowed to SRDs to counter the WLAN and other radio service potential for interference . This should , in any case be examined by WG SE ( SE24).

Could you please enter this response as necessary .

Sincerely  
Mike Brookes Chairman LPRA