

## The Consultation

### Higher Power Limits for Licence Exempt Devices

#### The Response of Motorola Ltd.

Motorola is grateful for the opportunity to contribute to the process of amendment of the licence-exemption arrangements in the UK. We are pleased to offer the following points:

#### Overview of Key Points

1. Motorola supports an increase in power level to assist the delivery of services in rural areas in both the 2.4GHz and 5GHz bands.
2. Increasing power levels to 10W at 2.4GHz gives rise to concerns over interference and general loss of service efficiency in the event that this was done in congested or potentially congested areas with mass market solutions. However, tightly controlled deployments of 10Watt systems in specific areas may well be acceptable. It may further be appropriate to arrange a slight increase in permitted power generally without cause for concern.
3. Motorola agrees with the proposal for a light licensing regime as a means of limiting deployments to areas where the risk of interference is acceptable from the higher power transmissions at 2.4GHz.
4. Motorola does not accept that equipment modifications to make it location-aware is a viable solution due to the coverage exceptions in such schemes and other issues at 2.4GHz. There would be no guarantee that the system would not result in numbers of high power schemes in metro areas.
5. At 5GHz Motorola agrees with the proposals of the consultation.

## Detailed Questions

***Q1: Have all the possible victims of interference been correctly identified and quantified as far as possible?***

Motorola does not believe it will be possible to identify all the possible victims of interference.

***Q2: Have the costs and benefits been correctly captured? In particular, are the costs of interference to WLANs appropriately assessed?***

No comment.

***Q3: 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?***

In view of the practical limitations, Motorola prefers a light licensing regime.

***Q4: Should we move from specifying radiated power to specifying conducted power?***

Motorola notes that it is much easier to assess conformity on the basis of conducted power limits. However, in this particular situation we are of the opinion that the high power deployments in rural areas will be for the purpose of connecting locations. Thus antenna of high gain can be expected to be employed fairly frequently. With this in mind, we would suggest that limits based on effective radiated power would be more useful to stakeholders.

***Q5: 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?***

Motorola prefers a light licensing regime for all higher power deployments. That these be restricted to rural area and that the maximum power level generally be reviewed with a view to a small but significant increase.

***Q6: 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 to both aspects of this question.

If there are any questions relating to this response please refer them (in the first instance) to

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