Question 1: Have all the possible victims of interference been correctly identified and quantified as far as possible?: Having high power signals on the top three channels will compress the non high power operations onto the lower channels. This increase in activity could severely impact with the licenced operation by radio amateurs in the 2400-2450MHz segment. this segment is quite heavily used by radio amateurs transmitting television in both analogue (FM) and digital modes both on a one to one basis and by using well sited repeater stations.

We would question whether or not the new High Power units could be made so that they can ONLY operate on the top three channels. If not then it will be impossible to regulate their (mis)use on the lower channels.

We suggest that any high power installations should be required to use vertical polarisation if gain/directional antennas are employed. This would reduce potential mutual interference between the two systems.

Question 2: Have the costs and benefits been correctly captured? In particular, are the costs of interference to WLANs appropriately assessed?: We suggest that most businesses, certainly those in rural areas, would not have need for any wireless equivalent of ADSL2+. This is required only for such applications as streaming video.

The penetration of extended reach ADSL over copper means that the market for these high pwoer systems in rural areas would be much lower than your numbers suggest.

In any event the roll out of UWB WIMAX will surely provide the same level of performance and further reduce potential demand.

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?: Obviously, if these changes take place, we would prefer the location aware mechanism.

If the units are receiving GPS data then it would be possible to have the GPS location data encapsulated into its transmissions in order to identify its actual location. This would greatly improve oversight.

It would also be possible to require the units to automatically adjust their transmitted power to the minimum required to successfully maintain the link. Again this would reduce the level of mutual interference.

**Question 4: Should we move from specifying radiated power to specifying conducted power?:** No.

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?: The existing regulations should be retained

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?: If

any change then this should be simply in accordance with ECC Recommendation and yes the database should be open

**Additional comments:** We suggest that, although the amateur and amateur satellite service is "only" a secondary service according to ITU Regualtions, to further increase the level of interference to our service by the use of high power licence equipment on adjacent, or possibly the same frequencies, is unreasonable.