

Question 1: Do you agree with Ofcom's proposal to exempt users of Citizen's Band (CB) radio (and other related applications such as Community Audio Distribution) from the need to possess a Wireless Telegraphy Licence.:

Question 2: Do you agree with Ofcom's proposals to permit the use of 'Micro' FM transmitters in the UK, and to authorise that use by licence exemption.:

Question 3: Do you agree with Ofcom's proposals to exempt users of High Density Fixed Satellite Services (HDFSS) terminals from the need to possess a Wireless Telegraphy Licence.:

Question 4: Do you agree with Ofcom's proposals to exempt users of Inmarsat GAN terminals from the need to possess a Wireless telegraphy Licence.:

Question 5: Do you agree with Ofcom's proposals to make available the frequency 24.05-24.25 GHz for use by short range radar (including automotive applications) devices on a licence-exempt basis.:

Question 6: Do you with Ofcom's proposals to make available the band 2.4 GHz-2.4385 GHz for movement detection systems.:

Question 7: Do you with Ofcom's proposals to remove the need for users of most radar level gauge equipment to possess a Wireless Telegraphy Licence.:

Question 8: Do you agree with Ofcom's proposals to exempt users Digital PMR 446 from the need to possess a Wireless telegraphy Licence.:

Question 9: Ofcom would welcome comments on it proposals to implements these changes concerning short range devices.: In document "UK Radio Interface Requirement 2030 Short Range Devices (Version 1.3)"

Table 2.1 Page 10

(g) In categories xiii, xiv, xvi & xvii consecutive channels may be combined where a larger bandwidth is required, due to the modulation of the signal, up to the maximum sub-band frequency allocation. The total signal bandwidth, including frequency error and drift, must be contained within the allocated sub-band under all conditions.

This change is welcome, as it clarifies a position that is already held by many designers/manufacturers. However, it could be argued that it is unclear whether if all channels when added together to make one large channel (filling the entire sub-band) is the Duty Cycle the stated value for one band, or can each channel be added up, to give a different value.

To put another way, if I transmit on 868.0 with 25kHz channel I am limited to 1% duty cycle. If add up all the channels in this subband (24 of them) and use the entire subband am I limited to 1% duty cycle 1/24% duty cycle or even 24% duty cycle in this new fat channel?

Personally I would like to see it clarified as 1/24% to keep the subband very open, and useable by many, (infrequently), but probably this view will not be upheld.

This needs to be clarified as people will hold different views, and abuse this adding together of the channels to 'eat' even more duty cycle up. Thus leaving the narrowband RF users at a double disadvantage, one, all the channels are being used simultaneously, and two, they may be being used for longer. They will now not be able to hunt for a free channel, as all channels could be in use for up to 1% duty cycle, measure over an hour. So the whole subband could be used for 36 seconds ! Or even worse, if it was decided to clarify this and allow the addition up to 24% duty cycle per hour, the whole subband could be in use for nearly 15 minutes. This is quite obviously ridiculous, and not wanted or intended.

Even before this proposed change the case was being argued that it was allowable to transmit at 1% duty cycle in each and every band simultaneously. Not really in the spirit of the document, as the low duty cycle was imposed to allow more users to co-exist, not allow one set of equipment to occupy more bandwidth by simultaneously using 1% in every channel.

Another ambiguity that could be cleared up at the same time, is whether or not this duty cycle is calculated on a single transmitter, or on an overall system.

An example is 100 transmitters all talking to a single receiver, is the duty cycle per transmitter, or for the whole system. One interpretation leaves 99% of bandwidth for use by other products, the second interpretation fills the entire bandwidth, and allows no other users to use this channel. This could be easily clarified, and leave all designers and manufacturers on the same level playing field.

To summarise my points, the document should specify this parameter with no room for ambiguity, and it should also state that this figure is per transmitter, or per system.

Question 10: Ofcom would welcome comments on its proposals to implement EC Decision 2005/928/.

Question 11: Ofcom would welcome comments on its proposals to implement EC Decision 2005/513/.

Question 12: Ofcom would welcome comments on any of the minor changes set out in this chapter and any other broader issues in relation to its approach to licence-exemption.

Additional comments: