

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.: No comment.

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.: Ofcom's proposals to permit the use of 'Micro' FM transmitters in the UK by way of licence exemption are reasonable and sensible. These proposals should be welcomed by all parties for the following reasons:

1. They will help to clarify the understanding of consumers, suppliers and manufacturers about the lawful sale and use of such FM transmitters within the UK. The current legal position in the UK, whereby the sale of such transmitters is lawful but the use of such transmitters without a licence is unlawful, is illogical and likely to cause confusion. A legal system, in which the sale and unlicensed use of such transmitters is lawful, would bring the UK in line with a number of other European legal systems and would enable all interested parties (including the general public) to deal with these transmitters with a clearer understanding of their legal status.
2. They will reduce the regulatory burden on individual users of such FM transmitters, where the possibility of interference from such equipment is very limited. This reduction of regulation should also benefit Ofcom because, once the use of such FM transmitters is authorised by way of licence exemption, Ofcom will have more time to turn its attention to more pressing regulatory matters.
3. As highlighted by Ofcom itself within this consultation paper, the deregulation of the use of such FM transmitters has the potential to stimulate the market for them in the UK. This in turn will provide an enhanced economic incentive for interested parties to invest in the research, design and development of such FM transmitters and associated innovative radio technologies and applications within the UK. Furthermore, this encouragement will assist UK producers and suppliers in their efforts to place the UK at the forefront of the European market for evolving and innovative technologies.
4. They are consistent with existing widely supported European solutions (e.g. CEPT), which will facilitate the drive towards harmonisation of the European market for such FM transmitters. This harmonisation will benefit both consumers and producers by driving down purchase and production costs for and by increasing public certainty about the lawful sale and use of such FM Transmitters.

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.: No comment.

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.: No comment.

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.: No comment.

Question 6: Do you with Ofcom's proposals to make available the band 2.4 GHz-2.4385 GHz for movement detection systems.: No comment.

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.: No comment.

Question 8: Do you agree with Ofcom's proposals to exempt users Digital PMR 446 from the need to possess a Wireless telegraphy Licence.: No comment.

Question 9: Ofcom would welcome comments on its proposals to implement these changes concerning short range devices.: The principles behind Ofcom's proposal to implement certain changes arising out of the European Commission's draft Decision on harmonisation of the radio spectrum for use by short-range radio devices are to be welcomed for the following reasons:

1. The agreement and creation of uniform access conditions for the use of the radio spectrum throughout the EC will enhance the free movement of relevant short-range devices and will create a more competitive market. The resulting reduction in costs for such short-range devices will benefit consumers, as purchase costs will be reduced, and manufacturers, as production costs will be reduced and legal certainty increased.
2. The encouragement and creation of improved uniform market conditions for such short-range devices will appropriately reward and promote innovation and research. This will provide a further impetus to the changes required for developing a dynamic information society throughout the EC based upon latest technologies.

Question 10: Ofcom would welcome comments on its proposals to implement EC Decision 2005/928/. No comment.

Question 11: Ofcom would welcome comments on its proposals to implement EC Decision 2005/513/. No comment.

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.: No comment.

Additional comments: Background information about the consultee and its interest in this consultation paper:

DSG Retail Limited is the core trading company for the DSG international Group. DSG Retail Limited trades as Dixons, Currys, Currys.digital and PC World, and is a market-leading electrical goods retailer. PC World is currently marketing and offering for sale certain short range FM transmitters. The sale of these transmitters is lawful in the UK and throughout Europe. Although the use of these transmitters is also lawful in a number of European countries, it is not currently lawful to use them in the UK unless the user has obtained a Wireless Telegraphy Licence from Ofcom.

DSG Retail Limited welcomes Ofcom's initiative in preparing and presenting this consultation paper for public consideration and consultation. In particular, DSG Retail Limited wishes to set out in its consultation response its considered reasons for agreeing with Ofcom's proposal to exempt 'Micro' FM transmitters from existing licensing requirements so that these can be used lawfully in the UK without a licence. DSG Retail Limited hopes that its consultation response will increase the likelihood of Ofcom's proposals being accepted and put into effect so that the unlicensed use in the UK of certain short range FM transmitters is made lawful as soon as possible.