BAA

BAA's Response to "Award of available spectrum:

10GHz, 28GHz, 32GHz and 40GHz"

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Draft response to Ofcom Consultation: Award of 10; 28; 32; 40GHz Spectrum

BAA welcomes the opportunity to respond to Ofcom's consultation "Award of 10; 28; 32; 40GHz Spectrum"

BAA is the world's leading private airport operator, with seven UK airports including the three London airports Heathrow, Gatwick and Stansted and twelve international airport interests. Heathrow is the world's busiest international airport in terms of passenger numbers. Every year over 140 million passengers travel through our UK airports. The UK Government forecasts that passenger numbers will double over the next 20 years.

BAA's airports are some of the most complex radio environments in the UK, with a large number of service types and a heavy demand on spectrum. Radio communications are critical to airport operations, helping to ensure the safety and security of all airport users. Airport expansion and the provision of new wireless-based services will lead to increasing demands on the radio spectrum.

BAA is ideally placed to manage the radio spectrum for the benefit of all airport users due to its detailed specific knowledge of the built environments. We already manage spectrum usage across all bands, including license-exempt bands, to minimise the risk of interference. We support moves towards a flexible micromanagement of spectrum at our airports.

BAA strongly supports Ofcom's proposals for the release of additional spectrum in the 10, 28 and 32 GHz bands, as this may help ease spectrum congestion at airports and assist the development of new or enhanced services. However BAA believes that dividing the spectrum into smaller geographic areas would better enable the development of services tailored to the requirements of BAA and others.

BAA notes that Ofcom propose not to release spectrum in the 40 MHz band for at least two years due to an apparent lack of interest from industry. However BAA believes that this spectrum should instead be released on a lightly-licensed basis, to enable use of the spectrum at the earliest opportunity. This might offer an attractive alternative to those organisations which require spectrum but which are unable to acquire any in the 10, 28 or 32 GHz bands.

Answers to specific questions in the consultation document are given below.

Question 1: Do stakeholders agree with the proposals for the award of licences in the 10 GHz, 28 GHz and 32 GHz bands in 2007?

Whilst BAA supports the release of this spectrum, BAA is unlikely to be interested in acquiring either nationwide licenses, or licenses with as large a geographical coverage area as proposed in the consultation.

Question 2: Do stakeholders agree with the proposal to include in the award of the 32 GHz band; that portion of the band that has been open since 2003 for point-to-point applications?

BAA concurs with Ofcom's proposal to include the 32GHz band in the award, based on the commonality of applications discussed in the consultation.

Question 3: Do stakeholders agree with the proposal to defer the release of the 40 GHz band and review the position in two years' time?

BAA does not agree with Ofcom's proposal to defer release of the 40GHz band. It is BAA's opinion that, if this band were awarded under Light Licensing conditions, it would open up further opportunities for the development of possible new services, especially for organisations which could not acquire spectrum in the three lower bands.

Question 4: Do stakeholders have any other comments on the contents of this document?

BAA's spectrum requirements cover relatively small geographical areas at airports; therefore BAA would be strongly supportive of market mechanisms which enable local use. Although secondary trading should enable disaggregation of licences, BAA is concerned that this may take some time to achieve until the spectrum market is well developed. Therefore BAA would urge Ofcom to distribute spectrum in local packages where possible.