

Network Rail Response to Ofcom Business Radio Trading & Liberalisation Consultation 6th July 2006

1.5 - Network Rail have concerns over any changes to the technology and alignment of spectrum usage by its neighbours, and would wish to be consulted on those proposed changes with the potential of participating in compatibility modelling and testing where clear evidence of technical and operational compatibility is not already available.

1.6 – see 1.5 above

1.12 – The technical restrictions proposed by Ofcom for recent spectrum auctions have been related to spectral masks with absolute limits, rather than being related to peak carrier level. Such an approach, combined with no acknowledgement of the number of transmitting devices, appears to give little protection of the noise floor in adjacent spectrum. This shortfall was acknowledged by Ofcom's Peter Spital during the 6th June Ofcom consultation workshop; Peter agreed to re-visit Ofcom's proposed approach.

1.16 – Network Rail welcome the introduction of Spectrum Quality Benchmarks (SQBs), however we are concerned that the issue outlined in our response to 1.12 above appears to limit the necessary means to manage compliance with SQBs.

2.17 – see 1.12 above.

2.27 – Network Rail would expect Ofcom to exercise an equally diligent duty of care in respect of radio spectrum protection for all Critical National Resources, including Network Rail's train radio communications systems.

3.10 – See 1.16 above.

4.33 – See Item 1.12 above. Activity Factor and number of transmitting devices do not appear to form a part of Ofcom's recent proposals for spectrum usage in recent auction notices.

Question 1 – Ofcom's technically assigned license proposals appear to be well thought out.

Question 2 – The concept of Boundary Condition could be useful, but doesn't appear to address aggregate interferer levels within the licensed area (Area B in Ofcom's Figure 4.4). It would appear that the cooperation of a neighbour (the licensee of Area B) would not only be required to agree to higher signal levels at the boundary, but also to aggregate interferer levels raising the noise floor to an unacceptable level in that neighbour's licensed area. Network Rail believe that Ofcom, as noise floor manager, must be involved in the protection of spectral rights and actively ensure that the products they are supplying remain fit for purpose.

Question 3 – Light Licensing is not seen to be attractive to organisations such as Network Rail with mission critical communication requirements.

Question 4 – Network Rail have no issue with spectrum trading per-se, however this is caveated by the comments to 1.5 above.

5.22 – See 1.5 above

Question 5 – Network Rail have no specific comment on Geographical sub-division, however see 1.5 above for comments on Spectrum Segmentation.

Question 6 – Network Rail have no issue with extending spectrum trading to UHF 1 per-se, however this is caveated by the comments to 1.5 above.

Question 7 – Network Rail would not wish details of its licenses and allocations to be released into the public domain unless it had declared a specific intention to trade those licenses.

Question 8 – No opinion.

END