

Your response

Question	Your response
<p>Question 1: (Section 3) Do you agree with our proposal for a single authorisation approach for new users to access the three shared access bands and that this will be coordinated by Ofcom and authorised through individual licensing on a per location, first come first served basis? Please give reasons supported by evidence for your views.</p>	<p>Yes</p>
<p>Question 2: (Section 3) Are there other potential uses in the three shared access bands that we have not identified?</p>	<p>No</p>
<p>Question 3: (Section 3) Do you have any other comments on our authorisation proposal for the three shared access bands?</p>	<p>No</p>
<p>Question 4: (Section 3) What is your view on the status of equipment availability that could support DSA and how should DSA be implemented?</p>	<p>DSA is a useful technology but would not necessarily be compatible with operationally/safety critical use cases that require a guaranteed level of service and capacity.</p>
<p>Question 5: (Section 4) Do you agree with our proposal for the low power and medium power licence? Please give reasons supported by evidence for your views.</p>	<p>We agree that the basing the low power licence on a circular coverage area with a radius of 50m would be appropriate for small installations in dense, urban environments. But we do not believe that this would be the best method for licensing use on large campuses such as ports, airports or large industrial and manufacturing sites.</p> <p>Whilst it would be possible to licence large areas using overlapping, 50m circles, this process would not appear to deliver any material spectrum management benefit.</p> <p>As a general comment on the approach, we would be keen to understand how Ofcom anticipates licensing at large campus sites like Heathrow that are designated as Critical National Infrastructure with operationally/safety critical use cases.</p>
<p>Question 6: (Section 4) Are there potential uses that may not be enabled by our proposals? Please give reasons supported by evidence for your views.</p>	<p>We are concerned that the proposals for low-power base station deployments may prove prohibitively expensive for businesses with a requirement to cover a large campus.</p>

<p>Question 7: (Section 4) Do you agree with our proposal to limit the locations in which medium power licences are available? Please give reasons supported by evidence for your views.</p>	<p>We are concerned that the general restriction that medium power base stations may only be deployed in “rural areas” could make it prohibitively expensive for businesses to deploy networks across a large campus. We hope that Ofcom would consider the use of medium power base stations on a case by case basis, subject to the local spectrum environment (in accordance with paragraph 4.17 of the consultation document).</p> <p>We would like to understand more about the process for discussing the exceptions Ofcom are willing to make to the “rural areas” approach.</p>
<p>Question 8: (Section 4) Do you have other comments on our proposed new licence for the three shared access bands?</p>	<p>No</p>
<p>Question 9: (Section 4) Do you agree that our standard approach to non-technical licence conditions is appropriate? Please give reasons supported by evidence for your views.</p>	<p>The approach appears to be broadly appropriate, although whether it would be reasonable for Ofcom to give 5 years notice to revoke the licence for spectrum management purposes would depend on the scale of the deployment, the residual value of network equipment and the availability of substitutable network technologies.</p> <p>Heathrow, as a business, operates within long regulatory periods with long term investment planning. A 5 year notice period would likely not fit in with our investment planning process and would make investment decisions potentially unfavourable, leading to inefficient use of spectrum.</p> <p>We would hope that Ofcom would consider whether it would be appropriate to extend the notice period for enterprise users by special agreement on a case by case basis.</p>
<p>Question 10: (Section 4) Are you aware of any issues regarding numbering resources and Mobile Network Codes raised by our proposals which we have not considered here?</p>	<p>No</p>
<p>Question 11: (Section 5) Do you agree with the proposed technical licence conditions for the three shared access bands? Please give reasons supported by evidence for your views.</p>	<p>We understand the general requirement for outdoor low power base station antenna systems to be limited to a maximum height of 10 metres above ground level and to limit the power of mobile stations. These measures would provide an effective way to protect other</p>

	<p>users of the same channel. But we hope that it will be possible for Ofcom to consider granting permission to deploy networks with higher base station system antenna systems and with higher power levels on a case by case basis. This would help enterprises that may require coverage of a large campus.</p> <p>In the same way, we hope that it will be possible for the licensee to select the appropriate frame structure in order to optimise the uplink/downlink data rate split according to business requirements.</p>
<p>Question 12: (Section 5) Are there other uses that these bands could enable which could not be facilitated by the proposed technical licence conditions? Please give reasons supported by evidence for your views.</p>	<p>No comment</p>
<p>Question 13: (Section 5) Do you agree with our proposed coordination parameters and methodology? Please give reasons supported by evidence for your views.</p>	<p>Yes</p>
<p>Question 14: (Section 5) What is your view on the potential use of equipment with adaptive antenna technology (AAS) in the 3.8-4.2 GHz band? What additional considerations would we need to take into account in the technical conditions and coordination methodology to support this technology and to ensure that incumbent users remain protected?</p>	<p>No comment</p>
<p>Question 15: (Section 5) Do you agree with our proposal not to assign spectrum to new users in the 3800-3805 MHz band and the 4195-4200 MHz band?</p>	<p>Yes. The protection of Radio altimeters above 4.2 GHz must be a priority.</p>
<p>Question 16: (Section 6) Do you agree with our fee proposal for the new shared access licence? Please give reasons supported by evidence for your views.</p>	<p>We understand the thinking behind the proposal to licence small deployments on the basis that they may be broken down into a number of zones, each with a 50m radius.</p> <p>But we do not believe that this approach would scale well to large deployments by enterprises. The approach would lead to licence costs significantly above the level appropriate for cost recovery by Ofcom.</p> <p>A more suitable approach for large campus sites may be to pay per base station (assuming use of medium power base stations) with fees</p>

	set at a level to enable the principles of cost recovery.
Question 17: (Section 7) Do you agree with our proposal to change the approach to authorising existing CSA licensees in the 1800 MHz shared spectrum? Please give reasons supported by evidence for your views.	No comment
Question 18: (Section 8) Do you agree with our proposal for the Local Access licence? Please give reasons supported by evidence for your views.	Yes
Question 19: (Section 8) Do you have any other comments on our proposal?	No
Question 20: (Section 8) What information should Ofcom consider providing for potential applicants in the future and why would this be of use?	No comment
Question 21: (Section 8) Do you agree with our proposal to have a defined licence period and do you have any comments on the proposed licence term of three years?	Agreeing a defined licence period would be reasonable, but it would be important to put in place an efficient licence renewal process to minimise the risk of any gaps in service. For sites designated as critical national infrastructure it could be more appropriate to award indefinite licenses with an agree revocation notice period.
Question 22: (Section 8) Do you have any other comments on the proposed Local Access licence terms and conditions?	No
Question 23: (Section 8) Do you agree with our fee proposal for the new local access licence? Please give reasons supported by evidence for your views.	We agree that it would be appropriate to base fees on cost recovery.