

Your response

Question	Your response
<p>Question 1: Do you have any comments on our proposals to gather additional antenna parameters, and would you prefer Ofcom to specify a small number of antenna pattern ‘envelopes’ or for users to provide details of the specific antenna parameters in use for Ofcom to assess? Please provide reasons for your views.</p>	<p>N</p>
<p>Question 2: Do you have comments on the suggested approach to enable user-led coordination in certain circumstances?</p>	
<p>Question 3: Do you have any comments on our proposal to increase the power level of our Low Power product by 3dBm in the 3.8-4.2 GHz band?</p>	
<p>Question 4 Do you have any comments on our proposal to remove the requirement for licensees holding a Low Power 3.8-4.2 GHz licence to keep a record of the address at which mobile terminals connected to an indoor base station will be used?</p>	
<p>Question 5: Do you agree with our proposals to assume synchronisation between users, and coordinate base station to terminal instead of base station to base station in the 3.8-4.2GHz band? If no, please explain how other measures could increase sharing of the band.</p>	
<p>Question 6. Please indicate whether you support our preferred option of coordination at -88 dBm/20 MHz (based on I/N of + 3dB, at 1.5m) or a more conservative alternative of -91 dBm/20 MHz (based on I/N of 0dB at 3m), with reasons for your view.</p>	
<p>Question 7: Do you agree with our proposals for an increase in BEL in 3.8-4.2GHz? If no, are there alternatives which you consider could better achieve similar results?</p>	
<p>Question 8: Do you agree with our proposal that adjacent band protection for Shared</p>	

<p>Access users is in future limited to considering only the first 5 MHz above and below UK Broadband assignments?</p>	
<p>Question 9: Do you agree with our assessment that, in circumstances where localised shortages of spectrum have occurred, pricing can be used to influence requested spectrum amounts?</p>	
<p>Question 10: Do you agree that we should take measures to reflect the impact of bandwidth, power levels and urban/rural location in our pricing approach for the 3.8-4.2 GHz band? Do you think there are other factors we should be taking into account?</p>	<p>The directional thrust of your proposals makes a lot of sense. However the pricing proposal for medium power exceptions is the wrong approach. There can be a case for the use of pricing to match demand to scarce supply but that only functions with a flow of demand to be met. However, local licensing at any spot location is a binary event, since applications are met on a first come first served basis. So the pricing approach has the following problems:</p> <ul style="list-style-type: none"> a) The high licence price is a threshold that suppresses all innovations not generating enough revenues to pay for the license fee. Almost certainly that knocks out charitable or community type innovative uses of broadband wireless. b) The threshold does not discriminate between the user with a valuable enough use and a user who is simply just rich. c) Because likely “innovation” demand at a very specific location will be sequential in time, there is no test of whether the pre-emptive medium power use is optimal versus the larger number of low power more valuable uses it blocks. d) There is no reward with a single high price licence fee for the use of innovative more spectrum efficient technology <p>I support Ofcom having the flexibility to allow medium power use by exception, but price is the wrong criteria. Better criteria are “additionality” and “spectrum efficient technology innovation”</p> <p>“Additionality” is where the applicant can show the use does not just benefit the applicant but a significant enough number of third parties (to close the gap with the</p>

	<p>value from all the displaced multiple low power users).</p> <p>“innovative more spectrum efficient technology” – Advanced antennas with pencil beams and low side lobes significantly reduce the probability of harmful interference. A medium power application could be to illuminate Large Intelligent Surfaces (LIS) to get coverage into coverage dead zones. That is a better way to be spending the proposed £10,000 licence fee but in a way that directly drives innovation and citizen benefit.</p> <p>Consideration might also be given to exceptions for time shifted use where existing users in that location only have daytime use.</p>
<p>Question 11: How do you consider the illustrative prices would impact your spectrum requirements and future deployment plans in the 3.8-4.2 GHz band? Please provide evidence in support of your view.</p>	
<p>Question 12: Do you have any comments on our proposals to clarify the circumstances in which exceptions are available, the tests we will apply, and how this supports user flexibility outside our overarching rules?</p>	
<p>Question 13: Do you agree with our overall approach based around refining our existing coordination framework for Shared Access, whilst monitoring future opportunities for more user led and outcomes led coordination where evidence suggests it would be of benefit?</p>	
<p>Question 14: Do you agree with our assessment of the potential impact on specific groups of persons?</p>	
<p>Question 15: Do you agree with our assessment of the potential impact of our proposal on the Welsh language? Do you think our proposal could be formulated or revised to ensure, or increase, positive effects, or reduce/eliminate any negative effects, on opportunities to use the Welsh language and</p>	

treating the Welsh language no less favourably than English?	
Question 16: Do you have any other comments on the proposals set out in this document?	

Please complete this form in full and return to sharedaccessresponses@ofcom.org.uk.