

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: WRC-07 agenda item 1.4

To (Ofcom contact): Steve Green

Name of respondent: S.R. Hearnden

Representing (self or organisation/s): Intellect

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing

Name/address/contact
details/job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts?

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Name **S. R. Hearnden**

Signed (if hard copy)

WRC-07 agenda item 1.4

Intellect response to the Ofcom consultation on candidate bands under consideration at WRC-07 for IMT.

Question 1: Do you agree with Ofcom's analysis of the benefit of identifying spectrum for IMT at WRC-07 and the general consideration that needs to be addressed for each band?

INTELLECT:

Intellect in general supports the objective of identifying additional spectrum for growing global demand for wireless services at WRC-07. Intellect questions whether Ofcom has fully assessed the impact on incumbent services and has been consistent and sufficiently robust in its economic assessments and proposed treatment of the various candidate bands.

Intellect would support changing the existing IMT-2000 identifications to IMT in the ITU Radio Regulations. Intellect supports the concept of keeping the definition generic (to support other innovative wireless systems) as outlined below in 3.1 of Ofcom document.

3.1 Until now the position adopted by Ofcom in its engagement in international bodies dealing with preparation for WRC-07 agenda item 1.4 has been:

- *to support efforts to keep the IMT-Advanced family as open and flexible as possible;*
- *to support a non-binding identification of spectrum for IMT but keep this as generic as possible (i.e. for IMT rather than IMT-Advanced);*
- *to support changing existing identifications from IMT-2000 to IMT to foster greater flexibility in their use; and*
- *not to narrow down the list of candidate bands under consideration but to keep options open on all bands under consideration.*

Intellect notes that the existing identifications of spectrum for IMT-2000 do not actually confer any formal higher regulatory status for that application or the mobile service over other services to which the bands are allocated. However, an identification for IMT for a particular band gives an indication by administrations that the band may become available for IMT (and possibly other advanced wireless systems), and thus is an important element to facilitate global spectrum harmonization of IMT. The identification of new bands is generally supported by our members. Some members are opposed to particular candidate bands (e.g. 3400-3800 MHz and 3800-4200 MHz due to the impact on existing services).

Intellect supports the idea of designating 450 – 470 MHz for those countries where it may be needed due to geographical or economic consideration,

Question 2: Do you agree with Ofcom's proposal to seek a primary mobile service allocation in the band 470 to 862 MHz and a Resolution to initiate studies at WRC-07 for an IMT identification at WRC-11?

INTELLECT

Intellect supports Ofcom's position and would prefer this to all be achieved at WRC-07.

Question 3: Do you agree with Ofcom's proposal to support the development of a European Common Proposal for a co-primary allocation to the mobile (except aeronautical mobile) service and an identification for IMT in the band 3400 to 3800 MHz at WRC-07?

INTELLECT

Intellect agrees that an allocation to mobile service would be a reasonable objective, if this band was to be identified for IMT. However Intellect members have differing views on whether this band would be suitable for IMT due to existing services.

Question 4: Do you agree with Ofcom's proposal to oppose any change to the allocations or an IMT identification in the band 2700 to 2900 MHz at WRC-07?

INTELLECT:

Intellect does not have a view on whether 2700-2900 MHz should be allocated to the mobile service and identified for IMT, but we note that the rationale for the UK position is largely based on the fact that other countries do not support this band. Hence, in this case the economic factors Ofcom cites have not driven the proposed UK position.

Question 5: Do you agree with Ofcom's proposal to adopt a neutral position on whether the remaining bands are supported or opposed as candidates for a mobile allocation and IMT identification?

INTELLECT:

A neutral position implies that the UK does not care either way. However, for those bands which Ofcom considers are not suitable for IMT, there is no apparent benefit in having the band identified for IMT, and there are potential drawbacks. It is therefore difficult to understand why some bands would warrant a NOC position, whereas other bands warrant a neutral position. For each band Ofcom should decide whether or not an identification for IMT is in the best interests of the UK, and should support either an ECP in favour of identification (and, if needed, the addition of a mobile allocation) or a NOC ECP as appropriate.

Intellect recommends that Ofcom should strongly support NOC for the band 3800-4200 MHz. One Intellect member does not support this answer because it creates difficulties in identifying the band to IMT.