

Consultation response form

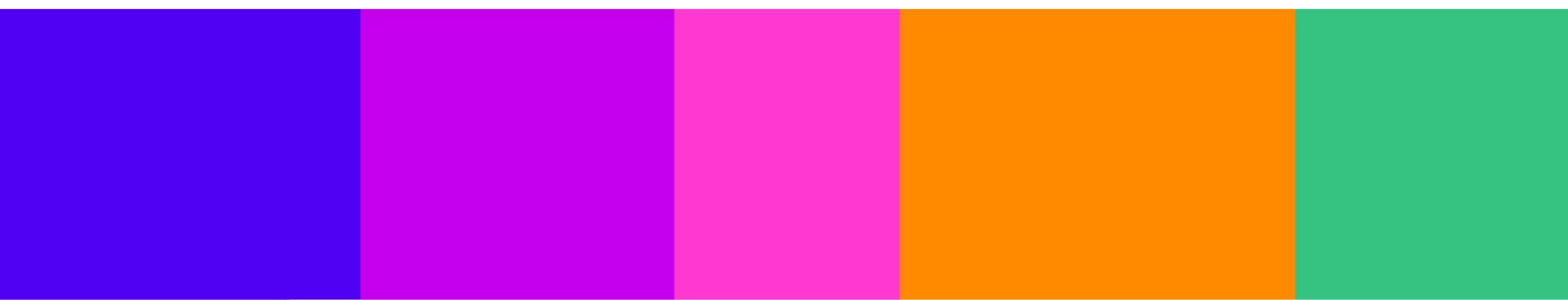
Please complete this form in full and return to regulations@ofcom.org.uk

Consultation title	Consultation: Updating Wireless Telegraphy Licence Exemptions
Full name	Dries Neiryck
Contact phone number	+44 7706 295 818
Representing (delete as appropriate)	Organisation
Organisation name	Ultra Wide Band Alliance
Email address	dries@uwballiance.org

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Your name
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes



Your response

Question	Your response
<p>Question 1: Do you agree with our proposals to extend the licence exemption relating to mobile terminals connecting to an MCA to include 5G devices? Please give reasons and provide evidence that supports your comments on the proposals.</p>	<p>Confidential? –N</p>
<p>Question 2: Do you agree with our proposals to extend the licence exemption relating to mobile terminals connecting to an MCV to include 5G terminals? Please give reasons and provide evidence that supports your comments on the proposals.</p>	
<p>Question 3: Do you agree with our proposals to introduce new licence exemptions for (i) Indoor Security Scanners and (ii) Audio PMSE devices? Please give reasons and provide evidence that supports your comments on the proposals.</p>	
<p>Question 4: Do you agree with our proposals to amend the technical conditions for various SRDs as set out in this document? Please give reasons and provide evidence that supports your comments on the proposals.</p>	
<p>Question 5: Do you have any additional comments on our proposed changes to the licence exemption for SRD equipment?</p>	
<p>Question 6: Do you agree with our proposal to introduce new licence exemptions for Radiodetermination, Location Tracking, Tracing and Data Acquisition, Vehicle applications and</p>	<p>The Ultra Wide Band Alliance fully supports the introduction of the new licence exemptions in the 6-8.5 GHz band.</p> <p>Our members and staff have been involved in the development of the underlying ECC and EC Decisions from the</p>

Question	Your response
<p>High Power Indoor-only applications in the 6-8.5 GHz band? Please give reasons and provide evidence that supports your comments on the proposals.</p>	<p>publication of the ETSI System Reference Documents, through the ECC sharing and compatibility studies and the publication of ECC Report 327 and CEPT Report 84. As the consultation document correctly states, these new exemptions can be introduced without risk of harmful interference to the other spectrum users.</p> <p>UWB is the only technology that can provide secure high precision distance bounding, making it indispensable for preventing relay attacks in vehicle access systems and other security-critical applications. This distinctive security feature, combined with its superior spatial accuracy and low latency, has driven widespread adoption by leading vehicle manufacturers and smartphone producers.</p> <p>The introduction will align the United Kingdom with the European Union, CEPT members and other countries implementing these provisions in their national spectrum regulations. It also brings benefits of scale to UWB equipment manufacturers, which results in reduced costs to consumers.</p>
<p>Question 7: Do you agree with our proposal to amend the existing licence exemption for generic UWB devices to make clear that the use of UWB in an aircraft, road vehicle or a train are not in scope of the exemption? Please give reasons and provide evidence that supports your comments on the proposals.</p>	<p>The Ultra Wide Band Alliance supports the proposal to clarify that the use of UWB in vehicular applications is not covered by the generic UWB regulations but is instead covered by the specific vehicular regulations. This will assure that the UK regulations are consistent with ECC Decision (06)04.</p>
<p>Question 8: Do you have any additional comments on our proposed changes to the licence exemption for UWB equipment?</p>	<p>The UWB Alliance would like to propose to align the naming of the “higher power indoor only applications” with the terminology of the EC and ECC Decisions. There the term “enhanced indoor devices” is used to reflect the fact that these UWB power levels are still extremely low compared to other radio technologies. Use of the same wording will improve clarity for all users of the regulations.</p> <p>A key advantage of UWB technology lies in its ability to operate effectively within spectrum already allocated to other radio technologies without causing harmful interference. This is due to its exceedingly low power spectral</p>

Question	Your response
	<p>density characteristics. In an era of increasing spectrum density due to the growing demand for wireless services, UWB's inherent spectrum-sharing capabilities represent an exemplary model for efficient spectrum utilization.</p> <p>The UWB Alliance wants to encourage the use of technologies that minimise their interference footprints. We request that OFCOM continue to support preservation of UWB operations in the 7125-8400 MHz band. This point is critical in discussions concerning the possible entry of IMT due to the extreme difference in power per MHz.</p> <p>We also would like to see expanded use of UWB. Within ECC, SE24 WI79 is looking to introduce similar regulations to this OFCOM consultation in the 8.5-10.6 GHz band. SE24 WI81 is investigating enhanced indoor location tracking in 4.2-4.8 GHz. The UWB Alliance would welcome the support of OFCOM for this work and for considering similar regulations in the UK in due course.</p>
<p>Question 9: Do you agree with our proposals to introduce a new licence-exemption for Group B AMRDs in Channel 2006? Please give reasons and provide evidence that supports your comments on the proposals.</p>	
<p>Question 10: Do you agree with our proposals to introduce a new licence exemption for very low power maritime radios operating in an on-land training setting to be made licence-exempt? Please give reasons and provide evidence that supports your comments on the proposals.</p>	
<p>Question 11: Do you agree with our proposals to extend the existing licence exemption for testing and development under suppressed radiation conditions? Please give reasons and provide evidence that supports your comments on the proposals.</p>	

Question	Your response
<p>Question 12: Do you agree with our proposals to extend the application of Regulation 7 of the 1989 Regulations i.e. that equipment users must conduct measurements to ensure that their equipment does not exceed the limits on spurious emissions, to anyone relying on the proposed exemption in the additional bands. Please give reasons and provide evidence that supports your comments on the proposals.</p>	
<p>Question 13: Do you have any other comments on our proposals to make amendments to the licence exemptions for this testing equipment?</p>	
<p>Question 14: Do you agree with our proposals to extend the existing exemption for radio equipment operated by visiting amateur radio users, to cover use by those on short visits from countries with which we have bilateral reciprocal licensing agreements?</p>	
<p>Question 15: Do you agree with our proposals to define a temporary visit as a maximum period of three months? Please give reasons and provide evidence that supports your comments on the proposals.</p>	
<p>Question 16: Do you agree with our proposal to introduce a new licence exemption for Fixed Wireless Access equipment operating in the 5725-5850 MHz band? Please give reasons and provide evidence that supports your comments on the proposals.</p>	

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