



Delivering for Britain

**The Chamber of Shipping**

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Mr J.Nixon  
Head of Defence Spectrum Management  
MOD – Whitehall  
London – SW1A 2HB

02 September 2008

Our Ref: MOD/Ofcom response

Dear Mr Nixon,

**UK Defence Spectrum Management Implementation Plan Consultation**

Thank you for giving us the opportunity to respond on UK Defence Spectrum Management Implementation plan consultation. The Chamber of Shipping is a trade association for UK-based ship owners and ship managers. With 154 members and associate members, the Chamber represents 860 ships of about 23 million gross tonnes and is recognised as the voice of the UK shipping industry. Please find enclosed our response below and it reflects the consolidated views of our members who represent a diverse range of operational shipping interests.

**Yours sincerely**

Captain Saurabh Sachdeva  
Nautical Consultant



Promoting our maritime future

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## Response to the UK DSM consultation

Question	Response
<b>Question 1.</b> Do you agree that the MOD has identified the options and factors that MOD should consider before deciding whether or not to extend the audit of the spectrum it uses?	Yes
<b>Question 2.</b> Do you have any views on the priority with which MOD should audit its spectrum use?	It will be more appropriate to audit potentially higher value shared spectrum first for identifying the real benefit of this process. We would also like to add that it is entirely MOD's preference as to how they wish to perceive through this concept.
<b>Question 3.</b> Do you agree with the phased approach to applying for RSA that the MOD is proposing?	Yes, but we would also like to add that UK's International maritime obligation under SOLAS should be adequately safeguarded. In our view additional safety allowance should be put in place in order to ensure that 406-406.1 mhz transmission by COSPAS SARSAT is not interfered. Since, most of the merchant ships rely upon this frequency to transmit ashore in an event of distress.
<b>Question 4.</b> Do you agree with the MOD's plans for releasing and sharing the spectrum it uses?	Yes, but we also expect that MOD will ensure that releasing or sharing their spectrum does not result in unexpected interference for the merchant ships in confined or coastal waters with special regards to the maritime safety, distress, SAR, radio communication and radar navigation.
<b>Question 5.</b> Do you agree with MOD's priorities for releasing and sharing spectrum?	Yes
<b>Question 6.</b> Do you agree with MOD's outline timetable for initial spectrum releases?	Yes
<b>Question 7.</b> Do you agree that MOD has correctly and fully identified the factors and options that should be considered before deciding to release and acquire spectrum in the market?	Disagree, as further detailed assessment needs to be carried out to correctly identify this mechanism.

[Type text]

<p><b>Question 8.</b> Do you agree that MOD has correctly and fully identified the factors and options that should be considered before deciding the best means with which to interact with the market?</p>	<p>Yes.</p>
<p><b>Question 9.</b> Can you identify any different approaches for the MOD to manage the spectrum it uses and engage with the market to deliver better value for money for defence and the taxpayer?</p>	<p>No comment</p>
<p><b>Question 10.</b> Which options (from paragraph 6.7) should be considered, or discounted, and if so why; either in respect of options already identified in section 6, or additional options, not identified?</p>	<p>Third option, as this will leave MOD to manage defence related spectrum.</p>
<p><b>Question 11.</b> Which issues relating to section 6 should be considered when evaluating options, and if so why; either in respect of issues already identified in that section, or additional issues, not identified?</p>	<p>No comment</p>
<p><b>Question 12.</b> Is the scope of decisions required against each of the four questions at paragraph 6.3, as indicated in section 6, sufficient and, if not, how and why it should be extended?</p>	<p>No comment</p>