

## **Response from the General Lighthouse Authorities to the UK Defence Spectrum Management Consultation**

### **Informative Note on the General Lighthouse Authorities**

The Corporation of Trinity House, the Commissioners of Northern Lighthouses (operating as the Northern Lighthouse Board) and the Commissioners of Irish Lights are the General Lighthouse Authorities (GLA) for the UK (including the Channel Islands and the Isle of Man) and the Republic of Ireland pursuant to the Merchant Shipping Act 1995, as amended and the Merchant Shipping Act 1894 in respect of the statutory undertaking of the Commissioners of Irish Lights in the Republic of Ireland. The GLA have statutory responsibility for the provision of maritime aids to navigation in UK and Irish waters, including radio-navigation systems. The GLA are therefore service providers using radio spectrum for safety of life and wreck-marking applications. The provision of maritime aids to navigation by the GLA is funded from Light Dues charged on certain ships, regardless of where they are registered, entering UK and Irish ports, but not on ships in transit through those waters. Light Dues are paid into the General Lighthouse Fund, which is administered by the Secretary of State for Transport pursuant to the Merchant Shipping legislation.

### **General Comments**

1. The GLA fully agree with the need to maximise efficiency of spectrum use, subject to safety considerations, protection of the environment, national security and the need to ensure compliance with international obligations.
2. The GLA would also support reducing regulatory barriers and simplifying processes, enabling faster access to spectrum, as long as harmful interference is prevented.
3. Radio-navigation services are provided by the GLA as aids to navigation, licensed and at a cost to the General Lighthouse Fund, pursuant to statutory responsibilities – legislation would be required to change this situation.

### **Answers**

The GLA answers to the questions posed in the Consultation Document are as follows:

**Question 1.** 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 its spectrum use?

A1: Yes

**Question 2.** Do you have any views on the priority with which MOD should audit its spectrum use?

A2: *Audit only the MOD managed and shared bands*

**Question 3.** Do you agree with the phased approach to applying for RSA that the MOD is proposing?

A3: Yes

**Question 4.** Do you agree with the MOD's plans for releasing and sharing the spectrum it uses?

A4: Yes

**Question 5.** Do you agree with MOD's priorities for releasing and sharing spectrum?

A5: Yes

**Question 6.** Do you agree with MOD's outline timetable for initial spectrum releases?

A6: Yes

**Question 7.** 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?

A7: Yes

**Question 8.** 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?

A8: Yes

**Question 9.** 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?

A9: No

**Question 10.** Which options (from paragraph 6.7) should be considered, or discounted, and if so why; either in respect of options already identified in this section, or additional options, not identified?

*A10: The first option should be discounted, the third would be preferred*

**Question 11.** Which issues relating to this section, 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?

*A11: It is agreed that most public sector bodies do not have the resources for commercial exploitation of spectrum. Before setting up a Third Party organisation for this purpose it should be demonstrated that the benefits will outweigh the costs and that the impact has been properly assessed.*

**Question 12.** Is the scope of decisions required against each of the four questions at paragraph 6.3, as indicated in this section, sufficient and, if not, how and why it should be extended?

A.12: See A11