

Maritime and Coastguard Agency response to
UK Defence Spectrum Management A Consultation on: An Implementation Plan for Reform

Question	Response
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 the spectrum it uses?	MCA is content with the overview of Civil Maritime uses (section 5.8 – 5.12 and the UK SAR reference in 5.13 but is unable to comment further on MOD decisions.
Question 2. Do you have any views on the priority with which MOD should audit its spectrum use?	It is recognised that the potentially higher value spectrum is audited first.
Question 3. Do you agree with the phased approach to applying for RSA that the MOD is proposing?	Yes, MCA believes the key issues for the maritime sector have been recognised in the consultation. Our particular concern is the safety-of-life (SOL) service operated by Cospas-Sarsat (C-S) at 406-406.1 MHz – this is mentioned in section 5.9. MCA requested Ofcom in its response to ‘Spectrum Framework Review for the Public Sector - Notice of Ofcom’s proposal to make regulations on Recognised Spectrum Access for public bodies and consultation on technical conditions’ to take account of the C-S technical response. This is also relevant for future proposals for 401-406 MHz.
Question 4. Do you agree with the MOD’s plans for releasing and sharing the spectrum it uses?	MCA’s primary concerns are for safety of life at sea and the application of international regulatory obligations. It is crucial that spectrum usage rights are based upon practical trials in addition to modelling in order that SOL services are fully protected from interference and that internationally mandated spectrum use is unhindered.
Question 5. Do you agree with MOD’s priorities for releasing and sharing spectrum?	As recognised in 5.58 “One example of constraint on the scope for the MOD to release spectrum is where it already shares spectrum with other users”, MOD shares with civil maritime in a number of bands and MCA expects to continue its dialogue with MOD as detailed plans are developed.
Question 6. Do you agree with MOD’s outline timetable for initial spectrum releases?	MCA considers the timing of any alternative uses with respect to interference protection (see Q 4 answer above) to be the primary issue.
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?	It is not possible to answer this question until detailed proposals, including protection criteria, are answered.
Question 8. Do you agree that MOD has correctly and fully	MCA supports the need for a pilot trial: “5.62 The MOD proposes to

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<p>identified the factors and options that should be considered before deciding the best means with which to interact with the market?</p>	<p>launch a ‘pilot’ trial that would enable it to commence releasing and sharing spectrum and to gain experience of engaging with the market.”</p>
<p>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?</p>	<p>No MCA response to this question.</p>
<p>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 section 6, or additional options, not identified?</p>	<p>No MCA response to this question.</p>
<p>Question 11. 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 MCA response to this question.</p>
<p>Question 12. 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 MCA response to this question.</p>