

C/o RNLI
West Quay Road
Poole Dorset
BH15 1HZ

5th September 2008

Dear Sirs,

The National Water Safety Forum welcomes being given the opportunity to comment on this process.

Much of the content of the consultation is of a nature upon which the Forum is unqualified to comment, however communications using the electromagnetic spectrum are a vital part of safety at sea, and it is in this area that our observations are pertinent, specifically to the use of distress communications through COSPAS/SARSAT.

Our observations follow.

Yours faithfully

Peter Chennell
Chair – Sea Advisory Group

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?	Yes
Question 2. Do you have any views on the priority with which MOD should audit its spectrum use?	No
Question 3. Do you agree with the phased approach to applying for RSA that the MOD is proposing?	Broadly, – however the NWSF is concerned that safety may be compromised if frequencies close to the 406 – 406.1Mhz frequency used by COSPAS/ SARSAT are released.
Question 4. Do you agree with the MOD’s plans for releasing and sharing the spectrum it uses?	Yes – provided that rigorous protection of that part of the spectrum used for distress, safety and SAR is maintained.
Question 5. Do you agree with MOD’s priorities for releasing and sharing spectrum?	No view
Question 6. Do you agree with MOD’s outline timetable for initial spectrum releases?	No view
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?	No view
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?	No view
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?	No view
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?	No view
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?	No view
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?	No view