



Response to MOD Consultation – UK Defence Spectrum Management

We welcome the publication of this consultation by the MOD and are grateful for the opportunity afforded us at the Industry Day hosted by the MOD.

This consultation does not address the parts of the spectrum most important to our operations however there are important framework questions addressed in the document and we would like to offer our views within the framework of the consultation questions.

Consultation Questions

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 spectrum it uses?

Yes.

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

Not at this point. The bands that we, as PMSE users, are most interested in are not considered in this document.

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

Yes. We have no particular view in this regard.

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

The reassurance offered by clause 5.40 is especially welcome in this respect. We can see potential for PMSE use to be an effective sharer of spectrum with MOD as we are able to accept and operative within restriction that MOD might require, most commonly geographical in nature.

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



Bands of specific interest to us are not included in the early releases so we have no view at this time.

6. Do you agree with the MOD's outline timetable for spectrum releases?

Yes. Again, the bands that we, as PMSE users, are most interested in are not included in this document.

7. Do you agree that the MOD has correctly and fully identified the factors and options that should be considered before deciding to release and acquire spectrum in the market?

Yes.

8. Do you agree that the 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?

Yes.

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?

There are no other options that we would propose.

10. Which options (from para 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?

We prefer the second two options and can see little merit in handing spectrum back to Ofcom.

We agree with the Independent Audit assertion that a third party would be better able to interact with the market but we feel less strongly about which of the two options would be better. On balance we wonder if the third option might lead to difficulties for the third party who would be trying to manage spectrum directly with non-MOD users but indirectly with MOD users. The second option allows the band manager to liaise directly with all the users of MOD spectrum and take account of their requirements.



We are very concerned as to the form and terms of reference of such a third party. Given the information currently to hand, we would favour a band manager to act as a third party for PMSE access to MOD spectrum as the best mechanism to ensure commercial exploitation while protecting the needs of the MOD.

We welcome the recent Ofcom consultation Digital Dividend Review: Band Manager Award and feel this work could offer a model that the MOD would wish to evaluate for its own purposes.

11. Which issues relating to section 6 should be considered when evaluating options, and if so why; either in respect of options already identified in section 6, or additional options, not identified?

The only point we would make in answer to this question concerns paragraph 6.18 and the potential need for other public bodies to appoint their own third party to manage spectrum access.

We are concerned by the thought that we, and other PMSE users of spectrum, might find ourselves having to deal with a number of different bodies in order to obtain access to spectrum. Given the nature of PMSE users of spectrum and the way in which spectrum is used in our industries we could find that we need to interact with several bodies to obtain the spectrum we need for a single event and that those bodies might be operating under different models. This would appear to very inefficient economically and so it would seem to be worthy of further investigation to see if there can be a coordinated method of access to spectrum for PMSE users such as ourselves.

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 should it be extended?

The issue of spectrum pricing is critical to us as PMSE users of spectrum. We do not exploit spectrum for profit in the same way a Telecommunications Company does, rather we use spectrum as a resource to enable us to offer news and event coverage and programmes to our customers with whom we have contracts. As a result, the value placed on spectrum could have an effect on whether or not we are able to continue to use it economically with corresponding restrictions in our ability to cover news and events.

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