

United Kingdom Major Ports Group & British Ports Association
 Combined Response to the
 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?	Yes - with the caveat that AIP should not be considered as the only tool for managing spectrum efficiency. As identified in the Cave report, consideration should be given to the retention of command and control mechanisms and the associated application of administrative charges only where safety and international obligations are involved.
Question 2. Do you have any views on the priority with which MOD should audit its spectrum use?	Whilst this is for MoD to choose, from the maritime perspective it should be noted that the need to resolve conflicts on an international basis may be a driving factor and may influence priority.
Question 3. Do you agree with the phased approach to applying for RSA that the MOD is proposing?	Yes, assuming that appropriate protections are put in place for each phase and are considered separately.
Question 4. Do you agree with the MOD's plans for releasing and sharing the spectrum it uses?	Yes, assuming that appropriate protections are put in place backed by practical trials to ensure that maritime frequencies and specifically internationally mandated spectrum are safeguarded from interference.
Question 5. Do you agree with MOD's priorities for releasing and sharing spectrum?	Yes, assuming that appropriate protections are put in place for each phase and are considered separately.
Question 6. Do you agree with MOD's outline timetable for initial spectrum releases?	Yes, and we support the caveats identified by the MoD within this paper.
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 agreed that a comprehensive review has been made but it should be recognised that further issues may arise as the result of further work.
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?	Broadly yes and we welcome identification of the need for a pilot trial.
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?	The MoD may wish to consider addressing with Ofcom the potential alternative of a combined Command and Control approach together with opportunity costing to some parts of the spectrum, particularly where safety and international agreements are involved.
Question 10. Which options (from paragraph 6.7) should be	Any option selected must ensure that the spectrum is effectively

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<p>considered, or discounted, and if so why; either in respect of options already identified in section 6, or additional options, not identified?</p>	<p>managed and that the manager is empowered to fulfil the role. It is vital that the use of a third party for spectrum management must be sufficiently robust to ensure that interference and any other conflicts are identified and resolved.</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>As for Q10, i.e. the need for managing and conflict resolution should also be addressed.</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 comment.</p>