

Question	Response
<p><b>Question 1.</b> 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?</p>	<p>The RYA is content that the safety aspects of radio communication in the civil maritime environment are documented in Section 5. The RYA is not able to comment on internal MOD decisions concerning the extent of its audit.</p>
<p><b>Question 2.</b> Do you have any views on the priority with which MOD should audit its spectrum use?</p>	<p>NO.</p>
<p><b>Question 3.</b> Do you agree with the phased approach to applying for RSA that the MOD is proposing?</p>	<p>The RYA recognises that the issues which may affect the recreational maritime sector have been documented in the consultation. Of particular concern is the distress alerting service operated by Cospas-Sarsat at 406-406.1 MHz (section 5.9). The RYA has provided a full response to Ofcom's proposal to make regulations on recognised spectrum access for public bodies and consultation on technical conditions - 'Spectrum Framework Review for the Public Sector' - in which we comment on these concerns in detail to Ofcom.</p>
<p><b>Question 4.</b> Do you agree with the MOD's plans for releasing and sharing the spectrum it uses?</p>	<p>The RYA prime concerns are for safety of life at sea and the continuance of the government's international regulatory obligations in the maritime sector. It is crucial that spectrum usage rights (SUR) are based upon practical trials and not only modelling to ensure that safety critical services are fully protected from interference and that internationally mandated spectrum use is respected.</p>
<p><b>Question 5.</b> Do you agree with MOD's priorities for releasing and sharing spectrum?</p>	<p>As we note above, the RYA is concerned with the proposal to release spectrum at the 406.1 MHz block edge which is critical for safety of life at sea and which might affect the performance of emergency beacons (EPIRB) because of ill-defined SUR. We note that the MOD shares a number of bands with the civil maritime sector and we would expect their continued dialogue with the maritime sector as detailed plans</p>

	concerning the release and sharing of spectrum are developed.
<b>Question 6.</b> Do you agree with MOD's outline timetable for initial spectrum releases?	The timetable for the release of spectrum must take account of guarantees that SUR will provide the required interference protection when alternative uses for released spectrum are considered. We would expect reasonable caution from the MOD in this respect.
<b>Question 7.</b> 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?	Not until all concerns raised as a result of this consultation process have been addressed and resolved.
<b>Question 8.</b> 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?	The need for a pilot trial is supported before the RYA can comment further on this aspect of the consultation.
<b>Question 9.</b> 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.
<b>Question 10.</b> 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?	The RYA is unable to comment.
<b>Question 11.</b> 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 RYA comment.
<b>Question 12.</b> 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 RYA comment.