

Transfinite Systems Ltd
Green Dragon House
64 – 70 High Street
Croydon
Surrey CR0 9XN

Jim Nixon
Head of Defence Spectrum Management
4th Floor Zone B Desk 17
MOD Main Building
Whitehall
London SW1A 2HB

5th September 2008

Dear Jim,

Transfinite Systems is pleased to be able submit this response to the consultation document "*An Implementation Plan for Reform*".

If you have any questions regarding this response please do not hesitate to contact us.

Yours sincerely,

John Pahl

Director

Transfinite Systems Ltd



Background to Transfinite

Transfinite is an independent UK company which specialises in the field of spectrum management, in particular in:

- Provision of specialised consultancy services on radio spectrum issues
- Developer of software products to analyse radio compatibility and to manage blocks of spectrum
- Management of blocks of spectrum for fixed service links and satellite earth stations

We have an excellent track record of study work which has encompassed a wide range of communications systems including both terrestrial and satellite services. Our key strengths are that:

- We can provide what we believe is amongst the best advice in the industry in the fields of tools, methodologies, simulation and modelling applicable to interference analysis and radio spectrum management;
- We can enhance this expertise by combining it with our wider knowledge of regulatory frameworks, spectrum management requirements and operational needs. We therefore understand the wider implications of sharing studies and, for example, can propose suitable regulatory solutions.

We have been involved in issues from high level policy (such as support for the review of the Communications Bill by the Joint Committee) to detailed studies of new spectrum management techniques (such as a proposal for a new approach to analyse spectrum efficiency and occupancy).

Our software product range includes:

- Visualyse Professional – a generic study tool to undertake interference analysis between a wide range of radio services including terrestrial and satellite;
- Visualyse Coordinate – to undertake analysis required to coordinate satellite earth stations with terrestrial services such as Fixed Service;
- Visualyse GSO – to support the coordination of GSO satellite networks during coordination trigger and detailed coordination stages.
- Visualyse Spectrum Manager – a web based solution that provides assignment management and on-line technical coordination including fixed link planning

We are owners of a spectrum licence at 28 GHz which we are able to use to provide point to point and point to multi-point fixed service links and also for satellite earth stations. We can use our own Visualyse Spectrum Manager to provide rapid and accurate planning of fixed service links with high quality of service and trusted engineering methodologies.

Consultation questions and responses

Questions 1 – 9 : No specific response.

Questions relating to Third Party Arrangement

- 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 this section, or additional options, not identified?
- Question 11. Which issues relating to this section, 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?
- Question 12. Is the scope of decisions required against each of the four questions at paragraph 6.3, as indicated in this section, sufficient and, if not, how and why it should be extended?

Response

We suggest there are significant benefits in there being multiple third party organisations rather than just one.

It is likely that a range of roles and skill sets will be required in different circumstances – for example an:

- a) Organisation providing support for the auction of a block of spectrum
- b) Organisation responsible for the management of assignments within a band in a way that protects existing MOD radio systems

Having a single organisation responsible for all tasks under section 6.12 of the consultation document is likely to result in unnecessary complexity, as the contractual agreement and information exchange will have to cater for so many disparate requirements. There can also be differences in the skills required under example b) above – for example the analysis required for planning a secure Tetra network is different from that to plan a network of point to point fixed links.

Using a single organisation would also reduce the opportunity for smaller but best-in-class companies to provide support for specific activities. As the examples a) and b) above are very different it is to be expected that it would not be the same organisation that is best at both. If the requirement is to find a single organisation that can provide both then the likelihood is that it will be best at neither.

In addition there could be different performance metrics for different types of activities, and hence different contractual arrangements.

Finally, having multiple third parties allows a gradual development and more flexible, responsive approach that can adjust to changes quicker.