

<b>TO (MOD contact):</b>	<b>Jim Nixon (jim.nixon374@mod.uk)</b>
Name of respondent:	Peter Wickson
Representing (self or organisation/s):	National Policing Improvement Agency
Address (if not received by e-mail):	

### What do you want MOD to keep confidential?

Details	Is this to remain confidential?
Name/contact details/job title	No
Organisation	No
Whole response	No

### Consultation Questions.

<b>Question 1.</b>	<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?</b>
<b>Answer 1.</b>	Yes, clearly there needs to be a balance between benefits in releasing and sharing of its spectrum assets and the costs for bringing it to the market.
<b>Question 2.</b>	<b>Do you have any views on the priority with which MOD should audit its spectrum use?</b>
<b>Answer 2.</b>	A clearly published timetable is essential for sharing parties to prepare their position
<b>Question 3.</b>	<b>Do you agree with the phased approach to applying for RSA that the MOD is proposing?</b>
<b>Answer 3.</b>	<p>A phased approach gives public bodies, like NPIA, an improved opportunity to assess the suitability of the bands for police communications, and if necessary, time to prepare a business cases to secure necessary funding from the Treasury through our sponsoring department, the Home Office.</p> <p>Regarding Table 2 note 7, which states MOD is not proposing to apply for RSA for the band 3442-3475MHz. NPIA is keen to engage with the MOD to agree our future sharing arrangements, especially following the recently announced European Commission Decision covering these frequencies.</p> <p>Clause 4.65 identifies the Spectrum Usage Rights (SURs). SURs are increasingly being put forward as a method for specifying interference in place of the more traditional Block Edge Mask for interference management. NPIA remains uncomfortable with the SUR concept and further clarification is sought, for example on how unacceptable levels of interference will be resolved should it arise at any point in the future.</p>

<b>Question 4.</b>	<b>Do you agree with the MOD's plans for releasing and sharing the spectrum it uses?</b>
Answer 4.	Yes, although the overall sharing of MOD spectrum by Emergency and public safety services is less than 2%, the hardware investments to support policing, mainly video applications, runs into £ms and these services must be protected when MOD engages with the market.
<b>Question 6.</b>	<b>Do you agree with MOD's outline timetable for initial spectrum releases?</b>
Answer 6.	Public safety shares a number of these bands and NPIA would want to engage with the MOD to formalise our sharing arrangements
<b>Question 7.</b>	<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?</b>
Answer 7.	Yes, although engagement with the market is a relatively new concept and there will be much to learn as we move forward.
<b>Question 8.</b>	<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?</b>
Answer 8.	Yes, although engagement with the market is a relatively new concept and there will be much to learn as we move forward. The PSSPG is also considering the option of a future spectrum management organisation and we hope to learn from the MOD's experience in this area.
<b>Question 10.</b>	<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?</b>
Answer 10.	Although returning spectrum to Ofcom has been identified, NPIA would consider this to be the least favourable option.  Option 3 should not prohibit the emergency services directly engaging with MoD where and when necessary.
<b>Question 11.</b>	<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?</b>
Answer 11.	There are still questions that have to be resolved in respect to the costs of sharing and how it relates to AIP for the band. Costs need to be fair and transparent, recognising that demand and use of spectrum will vary greatly throughout the country so fair and equitable methods have to be reached to ensure that rural and low populated areas are not disadvantaged.
<b>Question 12.</b>	<b>Is the scope of decisions required against each of the four questions at</b>

	<b>paragraph 6.3, as indicated in section 6, sufficient and, if not, how and why it should be extended?</b>
Answer 12.	Yes. These questions are very similar to those raised within PSSPG  The PSSPG will be addressing similar issues in their consideration of setting up a spectrum management organisation and we hope to learn from this.