

## **Ofcom's proposal to exempt the use of automotive short-range radar equipment at 24GHz from Wireless Telegraphy licensing**

Whilst understanding that the EC has made a decision on the use of SRR in the 24G band, I wish to comment on the Ofcom Consultation Document which raises several issues worthy of further discussion and consideration.

The band 21.65 to 26.65GHz contains two licensed fixed link bands as well as the astronomy and amateur services bands. Having personal involvement and experience in the use of two of these three services, I am most concerned about the Ofcom statements for non-interference from these new SRR devices can be controlled by the following:

- Limiting the number of vehicles (to 7%). In Section 4.15 reference is made to compatibility studies that have concluded that unlimited deployment of these SRR systems will cause unacceptable harmful interference to existing services in these frequencies. If only one car fitted with such a device can cause interference, why is there any justification that thinking any quantity deployed is acceptable?
- Exclusion zones around astronomy sites with manual de-activation permitted before June 2005. It is totally unrealistic to think that any driver with SRR fitted will understand and take notice of this mitigating solution.
- Ofcom annual review of interference. This will be a great way to collect data and produce more reports but what action will Ofcom take in the case of real interference cases? Does it have the technical resources to investigate and arbitrate in these cases? This is another UWB problem in higher frequencies that Ofcom needs resources to manage. Ofcom should know better than most that there are thousands of radio links in the 23 and 26G bands owned by fee paying license holders who expect interference protection to ensure high system performance availabilities.
- The technical specifications for these SRR devices needs to have stringent harmonic specifications

The decision by the European Commission is disappointing for the following reasons:

- As the industry already knows, equipment is already under development at 79G. Using the lack of 79G equipment as a justification demonstrates that the Decision was driven by internal political and commercial concerns. 24G equipment will be cheaper than 79G and so the Decision will not only relieve the pressure to complete the 79G product releases, but we should expect a request for extension some years down stream.
- The EC has violated the rights of Primary Allocations by this decision process which sets up a very worrying precedent.
- Given that Ofcom did not agree with this particular Decision, is Ofcom participating meaningfully in the EC committees to head-off these developments?

Respectfully  
J.Wood