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Richard Young
3:111, Mobile and Broadband Team,
Ofcom,
Riverside House,
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30 November 2007

Dear Mr Young,

RE: Ofcom Consultation on MCA - October 2007

The GSM Association (GSMA) is writing in response to the Ofcom consultation on Mobile Communications onboard Aircraft (MCA), October 2007.

By way of introduction, the GSMA is the global trade association representing more than 700 GSM mobile phone operators across 218 countries and territories of the world. In addition, more than 200 manufacturers and suppliers support the Association's initiatives as key partners.

We limit our response to the following Ofcom questions.

Ofcom Question: Do you have any comment in relation to the authorisation of MCA systems on the basis of a common European approach?

GSMA Response: See attached the GSM Europe position on the draft Commission Recommendation on the Authorisation of Mobile Communications in Aircraft (Attachment 1).

Ofcom Question: Do you agree that the ECC Decision and associated technical requirements and limits will adequately protect terrestrial networks?

GSMA Response: See attached the GSM Europe position on the draft Commission Recommendation on the Authorisation of Mobile Communications in Aircraft. (Attachment 1)

Ofcom Question: In your opinion do you think that MCA services would fall within the scope of the EC Regulation on roaming? Please explain why you think that MCA services would or would not fall within the scope of this regulation.

GSMA Response: The GSMA position is consistent with the ERG Guidelines on the International Roaming Regulation:¹ 'The Regulation does not apply to calls made to/from ships and planes using satellite networks.' The GSMA supports this position because providing MCA is significantly more expensive than terrestrial services due to:

- Significant investment and installation costs.

¹ ERG (07) 46 INTERNATIONAL ROAMING REGULATION, ERG GUIDELINES 2nd Release, August 2007, available at http://www.erg.eu.int/doc/whatsnew/erg_07_46_2nd_release_erg_guidelines.pdf

- Complex and costly aircraft certification and telecommunications regulatory processes required during the implementation and operation of the systems.
- More complex and costly operations and servicing of installed MCA systems.
- High data transport costs via satellite.

The GSMA would welcome an opportunity to provide clarifications on our responses.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Jack Rowley". The signature is fluid and cursive, with a prominent loop at the end.

Jack Rowley, PhD
Director Research & Sustainability
GSM Association



**GSM Europe Position
on the draft Commission Recommendation on the Authorisation of
Mobile Communications in Aircraft**

3 October 2007

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GSM Europe Position on the draft Commission Recommendation on the Authorisation of Mobile Communications in Aircraft

3 October 2007

The draft decision on MCA² appears to reproduce the tables of ECC Decision (06)07 without all of the accompanying detailed information. The ECC Decision is the result of a long, complex analysis and coordination process on the part of SE7 and WGRA. GSME considers that this "bare-bone" version of the ECC Decision could lead to a non-harmonised introduction of MCA services.

GSME believes that the RSC should use the results of the CEPT work in full and align its decision with the technical annex in ECC/DEC/(06)07.

Even in the case of an MCA system being properly adjusted to be in line with the emission limits as stated in ECC/DEC/(06)07, operation of the system at altitudes below those stated in the ECC Decision may result in interference to terrestrial networks. It seems to GSME that it would be particularly difficult for a terrestrial mobile operator to capture and record the necessary evidence that a particular aircraft causes interference to mobile terminals on the ground. Neither does it appear to be proportionate. In order for a responsible national regulatory body to police cases of suspected interference from aircraft, GSME believes that licences to operate MCA systems should require of the licensee the provision of the information necessary for regulators to ascertain whether or not an occurrence of interference from a particular aircraft has happened, possibly a long time after the incident took place. In addition, other regulations may be necessary, for instance regarding the provision of access by the NRA to reports documenting installation of MCA systems on particular aircraft (types and variants), and associated measurements. For example, in SE7's original "Attachment to Annex: Implementation considerations" they state that "the requirements for operation of an Airborne GSM system, which would ensure avoidance of interference into terrestrial networks, are highly dependent on many factors of the System, including the aircraft size and type, its RF isolation characteristics, propagation characteristics within the cabin and the installation of the onboard system. ..."; and that "Administrations wishing to authorise the operation of Airborne GSM systems may require that documentation describing the evaluation of installation be provided as part of the authorisation of the Airborne GSM system". We believe that such documentation should specify the specific power levels allowed for the aircraft. These power levels are much easier to monitor - in the case of interference - in everyday operation than the eirp levels outside of the aircraft in flight. We understand that in some cases the permissible eirp levels do not always guarantee service in all areas inside the aircraft, and that there could therefore be an incentive to raise the picocell power levels after authorisation to serve all customers - which would be a breach of the decision.

GSME also therefore believes that the RSC must ensure that there is adequate installation documentation, in particular specifying the power levels allowed, and that there should be a requirement for licensees to provide the information necessary for regulators to ascertain whether or not an occurrence of interference from a particular aircraft has happened, possibly a long time after the incident took place.

² Version RSCOM07-30.