BAA’s Response to Ofcom’s

Spectrum Framework Review: Implementation Plan

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Introduction

BAA welcomes the opportunity to respond to Ofcom’s Spectrum Framework Review Implementation Plan Consultation. However BAA believes the short time period made available to review such a detailed and important document is insufficient.

BAA is the world’s leading private airport operator, with seven UK airports including the three London airports Heathrow, Gatwick and Stansted and eleven international airport interests. Heathrow is the world's busiest international airport in terms of passenger numbers. Every year over 130 million passengers travel through our UK airports. The UK Government forecasts that passenger numbers will double over the next 20 years.

The Government has recently given the green light to major expansion of London’s airports in its’ 30 year Aviation White Paper. Announcing plans for a new runway at Stansted and a possible third runway at Heathrow, Alistair Darling said “Air travel remains crucial to our growing economy – our future prosperity depends on it”. BAA will invest over £8 billion in airport development, including Terminal 5, over the next 10 years.

BAA’s airports are some of the most complex radio environments in the UK, with a large number of service types and a heavy demand on spectrum. Radio communications are critical to airport operations, helping to ensure the safety and security of all airport users. Airport expansion and the provision of new wireless-based services will lead to increasing demands on the radio spectrum.

The lack of available spectrum, and the lack of flexibility in managing it, especially at Heathrow, are significant constraints on airport operations and the provision of services. BAA welcomes Ofcom’s proposals to allow trading and liberalisation of spectrum which we believe could lead to more efficient use of spectrum and new innovative services if correctly managed. On the other hand the many safety of life services at airports need to be adequately protected from interference which could arise from change of use of spectrum.

BAA believes it is ideally placed to manage spectrum at airports, especially for low power indoor systems, due to its detailed specific knowledge of the built environments. We support moves towards a flexible micromanagement of spectrum at our airports.

BAA notes that Ofcom’s preferred mechanism for the release of licensed spectrum is generally through auctions on a national basis. We believe that this will not necessarily lead to the greatest benefit to spectrum users. BAA has a strong preference for local licences due to the limited geographical extent of its airports. Also light licensing should be considered as an alternative to auctions in some cases, since this may lead to greater innovation and spectrum efficiency.
Answers

Answers to specific questions in the consultation document are given below:

**Question 5.1**
*Do you agree with these proposals for the award of Band III?*

BAA and airport stakeholders are heavy users of PMR, therefore BAA welcomes proposals to increase the amount of PMR spectrum in this band.

**Question 5.2**
*Do you agree Ofcom should award a national licence on a technology and service neutral basis by auction or is there another option for award that is more likely to meet users’ requirements?*

As stated above PMR is heavily used at airports and in short supply, especially at Heathrow. BAA anticipates that it will need to migrate to digital PMR at some time in the future, both to allow new services and to increase spectrum efficiency, however there is currently no suitable spectrum available. This band (410 – 415 MHz paired with 420 – 425 MHz) would be ideal for digital PMR. We would urge Ofcom to release this spectrum for local licences rather than a national licence.

**Question 5.3**
*Do you think that spectrum in the band should be allocated for emergency and business radio use?*

BAA believes that this spectrum (410 – 415 MHz paired with 420 – 425 MHz) should be reserved for business radio in particular.

**Question 5.5**
*Do you agree Ofcom should award a UK licence on a technology and service neutral basis by auction?*

This band (872 – 876 MHz paired with 917 – 921 MHz) may be useful to BAA for PMR-type services at airports. Baa agrees that awards should be service neutral, however BAA’s preference for the band would be for local licences rather than a UK licence.

**Question 5.6**
*Do you think Ofcom’s proposal is appropriate?*

This band (1452 – 1492 MHz) could potentially be used by BAA for broadcast services such as the distribution of flight information or advertising. BAA would prefer local licences rather than national licences.

**Question 5.7 & 5.8**
*Is the award of a small number of concurrent UK low power licences (on the basis described) the right approach?*

What, in your opinion is the optimum number of low power licences?

BAA considers that the band 1781.7 – 1785 MHz paired with 1876.7 – 1880 MHz has special commercial and operational significance due to its support by existing standard GSM mobile phones. Airport stakeholders could use the spectrum for
“wireless office” applications, and/or for PMR-type applications. BAA believes that local licences should be available from Ofcom (e.g. at airports). Alternatively low power licences could be made available on a light-licensing basis.

In the event of national licences only being available then measures may be required to ensure that these are obtained by new entrants offering innovative services.

BAA considers that Private GSM could have significant operational and commercial benefits to its community of users and is planning a trial to verify the benefits to the airport community.

**Question 5.10**
*Is a technology neutral UK licence or licences the right approach?*

BAA awaits the results of further work commissioned by Ofcom on this band (2010 – 2025 MHz).

**Question 5.13**
*Is a technology neutral UK licence or licences the right approach?*

BAA awaits the results of further work commissioned by Ofcom on this band (2290 – 2302 MHz).

**Question 5.16**
*Is a technology neutral award the right approach for the award of 2500 – 2690 MHz?*

BAA believes that a technology neutral award is appropriate, but that any new technologies operating in the band should respect the IMT-2000 spectrum mask.

**Question 6.1**
*Do you agree that the band should be open for further terrestrial applications once Ofcom has clarified and regularised current usage in the band?*

BAA welcomes Ofcom’s proposals to allow more intensive use of the band 3.6 – 4.2 GHz. This band is likely to be used for BFWA at BAA’s airports. Local licences would be preferred.