

5 December 2014

Dr. Joe Butler
Director of Technology Policy
Ofcom Spectrum Policy Group
Riverside House
2a Southwark Bridge Road
London SE1 9HA
UK

Dear Dr. Butler:

As Ofcom prepares to finalise its work on TVWS coexistence regulations, the Dynamic Spectrum Alliance¹ (DSA) would like to express its support for Ofcom's approach to protecting DTT receivers from harmful interference. In particular, DSA supports Ofcom's proposal to protect DTT reception based on (i) a classification scheme for TVWS devices and (ii) a framework providing for a "low probability of harmful interference". The success of various pilot tests conducted by Ofcom in verifying various aspects of the framework, coupled with the lack of observed interference at neighbouring properties throughout the pilot programme, have demonstrated that Ofcom has selected a sensible starting point. The pilot tests have shown in particular that it is not necessary to provide for coexistence by using cascaded worst-case scenarios of receiver performance and coupling gains.

We respectfully urge Ofcom to introduce the framework in such a way as to provide for a "low probability of harmful interference":

- a) To those transmissions that are intended for reception at any given location, and only those transmissions.
- b) For transmissions received on fit-for-purpose antenna installations which are physically and functionally as envisaged in the UK planning model.

We also urge Ofcom to:

- c) Actively encourage industry groups such as Confederation of Aerial Industries (CAI) and Digital Television Group (DTG) to draw up further advice for households to inform them about optimal installation practices and components, and about practices to be avoided, such as the use of unnecessary amplifiers.

¹ The Dynamic Spectrum Alliance is a global organization that includes multinationals, small- and medium-sized enterprises, and academic, research, and other organizations from around the world, all working to create innovative solutions that will increase the amount of available spectrum to the benefit of consumers and businesses alike. For more information and a full list of members, please visit www.dynamicspectrumalliance.org.

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- d) Actively encourage television receiver manufacturers and television distribution equipment manufacturers to improve the possibilities for coexistence with white space devices by developing technology that exhibits increased immunity to co-channel and adjacent channel interference.
- e) Gather evidence to support a relaxation in the coexistence framework as soon as poorer performing receivers and installations are replaced by better performing equipment.
- f) Continue to investigate other technology measures that can improve the efficiency with which spectrum is used, for example through sensing and monitoring, and introduce these measures to improve spectrum efficiency into coexistence frameworks.

We thank you for your attention to this matter and look forward to working with you in enabling commercial use of the television white spaces.

CC: Philip Marnick, Group Director, Spectrum Policy Group

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'H. Nwana', is positioned above the printed name.

H. Nwana
Executive Director