

**RESPONSE TO PAN-CHANNEL ISLAND CONSULTATION
ON 800 MHZ AND 2.6GHZ SPECTRUM AWARDS
CONSULTATION DOCUMENT**

Introduction / Background

This consultation response is provided by Guernsey Airport, a division of the Public Services Department, Guernsey which has responsibility for the operation of Guernsey and Alderney Airports.

The airports are licensed by the Director of Civil Aviation, a local Statutory Official, who is responsible for safety oversight of the operations. The DCA will use expertise from time to time which is delivered through the UK Civil Aviation Authority and the Bailiwick aerodromes are licensed in accordance with relevant European and Worldwide Aviation Standards.

This consultation response attempts to identify a number of technical issues which have to be carefully considered and taken into account when the issuance of licences is undertaken.

The proposed spectrum allocation is in a band currently utilised by Aviation Radar, located both in Guernsey and Jersey.

These radars are in the process of being replaced, and certainly where Guernsey Airport is concerned the new radar is being fitted with a filter which we understand should protect that device from interference from 4G devices. However, until the new radar is installed and fully commissioned, the existing radar remains in service and will be vulnerable to interference, with obvious safety implications. It is our view currently (as at September 2013) that the old radar will be decommissioned by the end of June 2014.

In addition, and despite the fitting of 4G filters to the new radar, we understand UK airfields are imposing exclusion zones around the premises to add a further layer of protection of interference.

Specific Consultation responses

Q1. Respondents' views are sought on the above objectives. In particular, CICRA seeks views on the balance it should strike between these objectives and what that might mean in practice for potential applicants and users of the spectrum. These views are intended to inform the services to which CICRA should give greater priority and what obligations should be imposed on potential applicants in allocating the 800 MHz and 2.6 GHz spectrum.

The five objectives relate largely to competition and environmental matters over which the Airport would have no comment. The fifth objective – specifically to ensure the process and criteria adopted by CICRA are consistent with Ofcom’s duties; including the duty to secure the optimal use for wireless telegraphy of the electro-magnetic spectrum is of critical importance to Guernsey Airport, as it is that body which governs and releases frequencies for use at Guernsey Airport and which understands and is responsible for interaction between technology in the UK and its impact on aviation functions. It is also the case that the UK Civil Aviation Authority when auditing the Guernsey Airport functions will take greater comfort from understanding that the OFCOM standards are applied locally with oversight.

Q2. Respondents’ views are sought on the above issues, namely:

- ***Commercial decisions based on the JCRA recommendation***
- ***Developments since the JCRA recommendation***
- ***Benefits of a pan-Channel Island approach***
- ***Scale of the available 2.6 GHz spectrum***

Guernsey Airport would have no view on the first three issues and would generally support a pan-CI approach.

Guernsey Airport accepts that some or all of the 190MHz block within the 2.6GHz spectrum is likely to be awarded, however it is imperative that the 10MHz at the top end of the 2.6GHz spectrum remains as a guard band and is never utilised.

Q3. Views are also sought on any other relevant factors respondents believe CICRA should take into account regarding existing recommendations to the extent they are relevant to future spectrum awards.

Any future spectrum awards must always take into account the potential impact on critical functions which are delivering services in and around the spectrum allocations that are proposed to be released. Aviation Radar is a classic example of this and the Airport takes much comfort from the fact that CICRA has recognised throughout the process that this is a potential issue. Continued engagement on proposals is both critical and greatly appreciated.

Q4. Respondents’ views are sought on the above aspects and on any other which respondents consider relevant. Views are also sought on the weight that should be given to each of these in any decision around spectrum awards and what these mean in practice for the construction of any award process.

Forgetting the commercial and competition benefits of having multiple telco providers in the CI it is unfortunately inevitable that the risk to Aviation Radar is greatly increased by the presence of multiple operators, especially in the airport terminal situation where the telco providers are vying for new arrival's business. Spectrum congestion implies multiple and complex interference scenarios and should be avoided when considering Radar safeguarding.

Notwithstanding the above it is imperative that any 4G roll-out be conducted under the guidance of OFCOM's "Notice of coordination procedure required under spectrum access licences for the 2.6 GHz band".

Q5. CICRA seeks views on whether it should structure its work so as to encourage a fourth telecommunication operator to provide mobile services in the Channel Islands.

Guernsey Airport would not support this.

Q6. CICRA seeks views on whether spectrum caps should apply as part of any award process and to what extent the issue of contiguity of any existing or new allocation is material to any decision process. If caps are seen to be appropriate or the need for contiguity of spectrum is important, respondents are asked to set out their preferred approach to dealing with these areas and reasons.

Spectrum caps might benefit Aviation Radar by restricting spectrum usage to the lower end of the 2.6GHz spectrum, assuming the number of telco's doesn't increase in proportion.

Q7. Views are sought on whether a sub 1 GHz spectrum cap is appropriate as a criterion for making any award, and the appropriate level of such a cap, if any.

Guernsey Airport has no view on the issue of sub 1GHz spectrum cap

Q8. Do you agree that CICRA should use the opportunity provided by the allocation of new spectrum to rationalise other parts of the spectrum?

Guernsey Airport has no view on this so long as the Aviation Radar band is adequately protected.

Q9. Views are sought on whether the charge proposed by the States of Guernsey raises special issues for CICRA in determining an appropriate allocation of spectrum in Guernsey or in the Channel Islands.

No comment – this is a commercial issue

Q10. Views are sought on the benefits of these two areas in which spectrum can be deployed and to what extent a strategic choice between them may be needed in any allocation decision.

Guernsey Airport doesn't have any specific views on the type of technology used. The parameters of importance to Aviation Radar are bandwidth and modulation and it must therefore be demonstrated that the chosen technology and its incumbent performance in respect of these parameters minimises the risk to Aviation Radar operation.

Q11. Respondents' views are sought on the issues in this section and, where additional considerations are identified, they are invited to set these out also. In particular, CICRA seeks views on the environmental factors – including actions in which telecommunication companies should engage – that might inform the construction of any award process and the weights or priorities it should give these factors in deciding on awards.

Location and distribution of masts will have to be considered carefully to take into account Radar safeguarding as well as general Aerodrome Safeguarding rules.

Q12. Respondents' views are sought on the above issues and, in particular, what specific combinations of 800 MHz and 2.6 GHz spectrum should be made available, or whether spectrum in these two bands should be made available as separate awards. Operators that intend to seek spectrum awards are requested to set out, in as detailed a manner as possible, what spectrum is sought and to what purpose.

This is only of interest to Guernsey Airport if it can be demonstrated that it affords more protection to the Airport's Radar.

Q13. Views are therefore sought on whether this approach is desirable and what CICRA might need to ensure is in place to give effect to any such approach.

Tradable licences – the airport would wish to ensure that if it is hosting any 4G masts at its site then it has some control over the technical operation and value of that mast if it is traded as part of any licence agreement. i.e. we would not wish for an

organisation to set up a installation and then transfer ownership at greatly enhanced profits as part of a traded licence, without the airport benefitting from a share of that increase in the value of the asset.

Q14. Views are sought on whether responsibility, if any, for the cost of filters for the Jersey airport radars should be on telecommunication operators in Jersey only.

Yes it is our view that changes to the Jersey Radar installation should be borne by Jersey operators only.

Q15. Views are sought on how the cost of installing filters at Jersey Airport should be shared among telecommunication operators, whether it should be the operators active in the 2.6 GHz band only, or those operating in all the bands that could be substituted for the 2.6 GHz band, or those offering 4G services, or operators using other spectrum also.

Any Jersey operator using that frequency for whatever purpose should bear an equal cost of that filter upgrade.

Q16. Respondents' views are sought on all five points above: value of forecasting model, KPIs, survey of existing DTT services, the setting up of a central delivery service, and the allocation of DTT mitigation costs.

Whilst we do not have a view specifically on DTT interference and who should remedy that, the issue here is of some relevance to us in a wider context, and is typical of the aviation radar interference issue. It is considered important that surveys of potential interference are undertaken and agreement is reached on how that interference is then filtered and by whom. Logically we would be of the view that the telco's who have the most to gain commercially from the service must fund that with an appropriate oversight from CICRA. I would expect that OFCOM would have a tried and tested methodology for dealing with this across all spectrums, and any national telco would have an understanding and experience of the expectations.

Q17. Views are sought on an appropriate competitive or comparative selection process and how best it might be structured to achieve the benefits sought.

No comments on this issue.