

THE IEEE 802 LAN/MAN STANDARDS COMMITTEE RESPONSE TO THE OFCOM CONSULTATION ON THE 870-876 MHZ AND 915-921 MHZ BANDS

COMMENTS OF IEEE 802

1. IEEE 802¹ respectfully submits these responses to the Ofcom consultation.
2. IEEE 802, as a leading consensus-based industry standards body, produces standards for wireless networking devices, including wireless local area networks (“WLANs”), wireless personal area networks (“WPANs”), wireless metropolitan area networks (“Wireless MANs”), and wireless regional area networks (“WRANS”). Included in our standards development activity is an emphasis on coexistence, which is the focus of our Wireless Coexistence working group. We appreciate the opportunity to provide these comments to Ofcom.

RESPONSE

3. First and foremost, we would like to commend Ofcom for considering the license-exempt usage of the 870-876 MHz and 915-921 MHz bands. We believe that effective use of this spectrum by services using licence exempt devices offers opportunities for growth in a wide range of applications in all sectors of the economy, including consumer, business, smart building, smart energy, to name a few.
4. IEEE 802 has been developing a number of standards and amendments to standards that can provide wireless communication services in these bands, including the IEEE P802.11, IEEE P802.15, IEEE P802.16, IEEE P802.19, IEEE P802.22 families of standards, to name a few. These technologies are widely adopted across the UK and Europe, serving as the foundation for WiFi, WiMAX, Ethernet, Bluetooth, ZigBee, etc.
5. We believe the following benefits would result from making this spectrum available:
 - Helps to satisfy the growing demand for M2M services.
 - Provides additional spectrum for other services, including Smart Metering, Smart Grid, Smart City, and Internet of Things applications.

¹ The IEEE Local and Metropolitan Area Networks Standards Committee (“IEEE 802” or the “LMSC”).

- Making the current spectrum licence-exempt (or, if required, lightly licensed) permits flexible spectrum sharing as applications evolve in the market place.
6. We commend the work that has taken place to arrive at the proposed rules for operation in these bands and endorse their findings.
 7. We believe that it is imperative to allow for the operation of Network Relay Points (NRPs) with duty cycles of up to 10% so as to strengthen the business case for the use of these bands, by allowing for network deployments otherwise made impractical, when used in combination with appropriate technical and procedural safeguards.

CONCLUSION

8. IEEE 802 supports Ofcom's efforts in this proceeding to adopt the regulatory framework for licensed exempt technology in the 870-876 MHz and 915-921 MHz bands. We believe that moving forward in opening up this spectrum to the kinds of devices and applications that have been so successfully deployed in the more established license exempt bands like the 863-870 MHz, the ISM 902-928 MHz, 2.4 GHz and 5 GHz will bring economic and social benefits to the people of UK.

Respectfully submitted,

/s/

Michael Lynch
Chair, IEEE 802.18 Radio Regulatory Technical Advisory Group
972.814.4901
freqmgr@ieee.org