



Directorate of Airspace Policy

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8AP/088/06/13/01

Spectrum Audit Consultation
Ofcom
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14 September 2005

Dear Sir or Madam

Independent Audit of Spectrum Holdings

Thank you for the opportunity to comment on the consultation concerning Spectrum Holdings by Public Sector Organisations. The CAA participated in the Independent Spectrum Review conducted by Professor Cave and has contributed already to the drafting of the consultation.

CAA supports the overall principle of a review of Spectrum used in the public sector and the desire to encourage and create an environment whereby greater spectral efficiency is achieved. However, it should be noted that aviation is an area where an element of institutional safeguarding will always be needed as it is a safety critical service. Any fundamental changes must not compromise safety and be implemented carefully in order to preserve our ability to discharge our international obligations.

CAA have responded in detail to Ofcom consultations on spectrum trading and liberalisation and cannot support the principle of market based mechanisms as a tool for managing the aeronautical spectrum. Aviation is significantly reliant on the availability of spectrum to meet the communication, navigation and surveillance requirements that are necessary to support the safe and expeditious flow of air traffic by commercial aviation, military operations and general aviation, including recreational/sport users. We have to ensure that spectrum is available for authorised use on approved systems within carefully defined volumes of coverage to meet specific service and area requirements in what is a growth area.

Detailed discussions between CAA and Ofcom on the viability of introducing trading into aeronautical bands have yet to take place. CAA would be willing to look at proposals for how trading could be applied to bands which impact on aviation (including adjacent bands) and perhaps this could be done as part of the current review of aeronautical licensing.

On the subject of incentive pricing no detailed proposals have been put forward since the original independent spectrum review of 2002 for aeronautical bands. There remains potential to consider the implementation of AIP however this must be looked at before deregulation is considered as once the licensing charging regime has been diminished it will never be recovered. Again CAA believes it is appropriate to consider the issue of incentive pricing as part of the licensing review being conducted at present.

Civil Aviation Authority

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Finally CAA is willing to consider the implications of sharing in CAA managed bands provided there is sufficient protection for aeronautical services. Whilst sharing could present significant difficulties within the major part of a band, there may be options worth considering in the margins where intensity of use is less. CAA would not support the introduction of a third party intermediary to facilitate sharing as it is unclear as to what purpose and added value this would bring to the process; and therefore believes that this could add further complications.

Overall CAA recognise that there is a need for aviation to demonstrate that it is an efficient and resourceful spectrum user and that new spectrum management initiatives may have a role to play in delivering greater efficiency. Naturally, the CAA would look to participate fully in discussions with Ofcom as to how such issues can be addressed.

Yours faithfully

Original Signed

Andy Knill

Manager Surveillance and Spectrum Management