The Radio Frequency Users Association of New Zealand Inc.

RFUANZ

5 Rewa Rd.,
Hataitai
Wellington

Phone +64 4 386 3290
Fax +64 4 386 3270
Email info@rfuanz.org.nz
www.rfuanz.org.nz

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806-960 MHz Band Replanning,
Radio Spectrum Policy and Planning
Ministry of Economic Development
PO Box 1473
WELLINGTON

SUBMISSION

Discussion Paper 806-960-mhz-band-replanning-options

Introduction

This submission is made on behalf of members of the Radio Frequency Users Association of New Zealand; some members may also make submissions in their own right.

RFUANZ appreciates the opportunity to comment on this paper and offers the following feedback;

General

Members of RFUANZ utilize spectrum in the band under review and are concerned at the potential for disruption to Landmobile services using frequencies in the 800MHz band especially those using simplex channels.

However RFUANZ sees potential for aligning the 915 MHz – 928 MHz Band usage to better reflect international usage. In particular an extended band 920 MHz – 928 MHz should be made available as a GURL in rural areas on a non interference basis. The availability of an 8 MHz block in this spectrum would permit its use for rural internet purposes.

Given that STL's are located largely in urban areas and are sparsely spread across the country RFUANZ believes such usage would in the main be compatible with existing usage.

Response to Questions

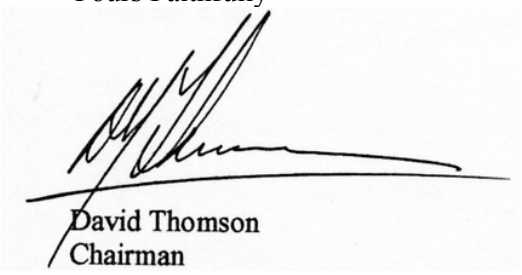
1. Do you consider that the Ministry should investigate any other options for further rationalisation of spectrum for cellular applications in the 806-960 MHz band? If so, please explain
    a. No, extensive other spectrum is available for cellular services.
2. If your organisation uses the KK band (806-812 MHz and 851-857 MHz), do you consider that the Ministry's assessment of utilisation of the band is accurate? If not, please explain.
    a. No comment.
3. If your organisation has STL licences, do you consider that the Ministry's assessment of the utilisation of the sub-bands (849-851 MHz, 915-921 MHz and 929-935 MHz) is accurate? If not, please explain.
    a. No Comment
4. If your organisation uses any of the land mobile radio sub-bands (812-819 MHz and 857-864 MHz, and 868-869 MHz), do you consider the Ministry's assessment of current usage to be accurate? If not, please explain.
    a. Yes.
5. With respect to the harmonisation of New Zealand's SRD spectrum in the 806-960 MHz band, do you have a preferred ITU Region or trading partner with which New Zealand's allocation should be harmonised? Please explain your preference.
    a. No information held.
6. Are there significant SRD-type applications that are presently precluded from being deployed, or are more expensive to deploy, in New Zealand due to the lack of full harmonisation with one or more trading partners in the 806-960 MHz band? Please provide an indication of additional SRD product costs being incurred when supplied on frequencies currently allocated for this purpose in New Zealand.
    a. The limitation of spectrum 7 MHz in the GURL at 921 MHz – 928 MHz prevents its use for a very cost effective provision of rural internet services.
7. Does your organisation wish to supply or deploy high-powered SRDs in New Zealand in the 915-929 MHz band? If so, what are the technical parameters of the equipment and spectrum usage?
    a. Yes. Members of RFUANZ would welcome the opportunity to install high-powered SRD equipment for rural internet services in the band 920 MHz – 928 MHz. For typical equipment specification see Motorola Canopy.
8. Does your organisation suffer from insufficient spectrum in the 806-960 MHz band at present, or do you see a future need for spectrum in this band that is not currently allowed for? If so, please provide details.
    a. Yes see 6 and 7 above.
9. Is the band 841-849 MHz a viable option for STL use? If not, please explain.
    a. No information held on this.
10. Are there services or applications other than STLs for which the spectrum at 841-849 MHz would be better allocated? If so, please provide details.
    a. No information held on this
11. Is the proposed expansion of the SRD allocation to 915-929 MHz, along with an increase in power from 1 watt to 4 watts for RFIDs operating at 920-926 MHz, viable and appropriate in New Zealand? If not, please explain.
    a. The band should be larger and extend to 928 MHz and include internet usage.
12. In regards to the interface between GSM/W-CDMA and SRDs at 915 MHz, would you suggest any mitigation measures for this interface? If so, please provide details.
    a. No information held on this.

13. Are the proposed two-phase licensing arrangements for STLs and SRDs in the 915–921 MHz band suitable? If not, please explain.
    a. No comment.
14. In Phase 2 of the licensing arrangements for STLs and SRDs in the 915-921 MHz band, would the utility of the band for SRD use be significantly degraded by permitting STLs to remain?
    a. No information held on this.
15. Do you agree with the creation of management rights in the 841-849 MHz band, and the subsequent allocation of management rights to private parties? If not, what is your preferred alternative and why?
    a. No comment.
16. Do you agree with the proposal that the Crown retains and commercially manages 2 MHz of spectrum in a management right in the 841-849 MHz band in order to allocate licences for STLs to non-rightholders? If not, what portion if any do you consider should be retained and how should it be allocated? Please explain your reasons.
    a. No comment.
17. Do you agree with the proposed 0.5 MHz lot size if management rights are sold in the 841-849 MHz band? If not, what lot size would you prefer and why?
    a. No comment.
18. Do you agree that the boundaries of proposed management rights in the 841-849 MHz band should be conditioned to enable digital STL use? If not, what boundary conditions would you prefer and why?
    a. No comment
19. Do you agree with the proposed 2.5 MHz initial acquisition limit for parties buying management rights in the 841-849 MHz band and retention of this limit for a five-year period? If not, what limits and time period do you prefer and why?
    a. No comment
20. What are your views in general on the Ministry's base proposal for replanning the 806-960 MHz band and the impacts? Are there other replanning options that you believe the Ministry should consider, and why do you prefer them?
    a. It's a start.
21. If your organisation has licences in the TX band (868-869 MHz) for simplex land mobile radio, do you still require access to spectrum for this purpose? If so, how long does your organisation intend to use this technology (do you have any plans to transition to different technology)? Is there any other band that could you use for your land mobile radio services instead?
    a. Yes.
    b. For the foreseeable future.
    c. No.
22. If the simplex LMR use was not relocated from 868-869 MHz, would use of the full 864-870 MHz band by SRDs be practicable by acknowledging the risk of potential interference to land mobile radio usage?
    a. No. Land mobile Services using this spectrum are located in urban areas and already suffer from significant noise floors limiting coverage without adding to it.
23. What, if any, provisions might be necessary to protect the cellular services operating in the private management right above 870 MHz from interference from SRDs if they operated up to 870 MHz?
    a. No information held on this.

24. If your organisation currently uses the 819-824 MHz band, are your able to retune your equipment to use different spectrum?
    a. No information held on this
25. What alternative uses could be made of the 819-824 MHz band currently allocated to SRDs?
    a. No information held on this
26. How can the unused spectrum (held in management rights) at 840-841 MHz and 885-890 MHz best be used? For example, are there technologies compatible with the adjacent cellular use that might be deployed?
    a. No information held on this

Thank you for the opportunity to comment on this paper.

Yours Faithfully



David Thomson
Chairman