

12 November 2017

Radio Spectrum Management Policy and Planning Ministry of Business, Innovation and Employment PO Box 2847 **WELLINGTON 6140** Radio.Spectrum@mbie.govt.nz

174 to 184 MHz: Land Mobile Radio Technical Consultation

We would like to thank the Ministry for the opportunity to submit on the 174 to 184 MHz: Land Mobile Radio Technical Consultation.

Kordia does not have specific comments on allocation design or most of the technical parameters. Kordia's submission is that the Ministry ensures that the proposed land mobile band design will be technically compatible with possible future DAB services. Both DAB mux operators and land mobile network operators must not have any unreasonable restrictions on site usage and co-location, nor should they require any extraordinary equipment specifications to implement co-existing networks.

Factors that could assist include:

- Creating a guard band between the land mobile band and the DAB band
- Allocating DAB frequencies from the top of the DAB band first
- Specifying duplex repeater base transmit channels in the upper portion of the band to maximise compatibility (noting that the Ministry also proposes simplex channels at the top of the mobile band).

Contact details for our submission are below:

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We would be happy to meet with the Ministry to discuss our submission further.

