



Joint Radio Company Ltd  
Friars House  
Manor House Drive  
Coventry  
CV1 2TE

Tel: +44 (0) 20 7706 5199  
e-mail: [info@jrc.co.uk](mailto:info@jrc.co.uk)  
[www.jrc.co.uk](http://www.jrc.co.uk)

Send to [Elizabeth.Press@ofcom.org.uk](mailto:Elizabeth.Press@ofcom.org.uk)

To: Elizabeth Press

## Notice of Ofcom's proposals to amend the spectrum trading and register regulations

Dear Ms Elizabeth Press,

As the representative for critical system operators and key stakeholders within the UK Energy Sector, the Joint Radio Company (JRC) welcomes the opportunity to respond to the Notice of Ofcom's proposals to amend the spectrum trading and register regulations.

JRC notes that Ofcom is proposing to go beyond the recommendations of the RSPG<sup>1</sup> and the position adopted by DCMS<sup>2</sup> in enabling access to the lower 2 GHz of the 26 GHz band under the Shared Access Licence provisions. Whilst the regulatory provisions for the lower 26 GHz band are being limited to low power indoor licences for 5G systems we note that the long term viability of this part of the band for incumbent users is likely to be negatively impacted by this action which is not informed by a demonstrable case for the need for access. We encourage Ofcom to reflect on the guidance from RSPG and DCMS and remove the lower 2 GHz of the 26 GHz band from the Shared Access Licence provisions.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Peter D. Couch', is written over a light grey rectangular background.

Dr Peter D. Couch, Chief Executive Officer, Joint Radio Company Limited (JRC)

The Joint Radio Company Ltd. (JRC) is an Industry-Owned Spectrum Management Organisation with primary responsibility for the management of radio spectrum used by the UK Energy Industry.

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<sup>1</sup> [https://rspg-spectrum.eu/wp-content/uploads/2013/11/RSPG18-036final-draft\\_opinion\\_on\\_5G.pdf](https://rspg-spectrum.eu/wp-content/uploads/2013/11/RSPG18-036final-draft_opinion_on_5G.pdf)

<sup>2</sup> <https://www.gov.uk/government/consultations/implementing-the-european-electronic-communications-code>