

## Your response

Question	Your response
<p><b>Question 1:</b>  <b>Do you have any comments on:</b></p> <ul style="list-style-type: none"> <li><b>a) whether the Proposed Regulations correctly implement our decision in the 2021 Repeaters Statement?; and</b></li> <li><b>b) our proposal to make the Proposed Regulations technology-neutral?</b></li> </ul>	<p>Confidential? – N</p> <p><b>a) whether the Proposed Regulations correctly implement our decision in the 2021 Repeaters Statement?; and</b></p> <p>On this point Cel-Fi by Nextivity has a comment regarding the definition of “Oscillation” introduced in the draft statutory instrument:</p> <p>The current Ofcom definition of oscillation does not take into account the operation of echo-cancellers, implemented by many vendors of RF repeaters, that can allow operation of systems in a safe and stable way where the system gain exceeds the RF isolation between the donor antenna and the coverage antenna. Cel-Fi by Nextivity proposes this revised wording:</p> <p>(6) For the purpose of this regulation—</p> <ul style="list-style-type: none"> <li>(a) a mobile repeater device makes oscillations when the echo of a transmission from the repeater in the downlink through the coverage antenna feeds back into the donor antenna (or the echo of a transmission in the uplink through the donor antenna feeds back into the coverage antenna) and causes either fluctuations in the transmitted power with a fixed input level, or unwanted out-of-band emissions, due to the feedback loop.</li> <li>(b) “anti-oscillation technique” means either— <ul style="list-style-type: none"> <li>(i) a technique which is used to automatically reduce the system gain of a mobile repeater device to stop that device from making oscillations; or</li> <li>(ii) any other technique which is used to stop a mobile repeater device from making oscillations.</li> </ul> </li> </ul> <p><b>b) our proposal to make the Proposed Regulations technology-neutral?</b></p> <p>Cel-Fi by Nextivity supports this proposal.</p>