**Via Email**

Jude Mulindwa | OFFICER INFORMATION SERVICES

Uganda Communications Commission

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[jmulindwa@ucc.co.ug](mailto:jmulindwa@ucc.co.ug)

Re: Uganda Communications Commission consultation guidelines to manage TV White Space radio spectrum use in Uganda.

Dear Mr. Mulindwa:

The IEEE 802 LAN/MAN Standards Committee[[1]](#footnote-1), as a leading consensus-based industry standards body is pleased to review the Uganda Communication Commission consultation on guidelines for use of the TV White Spaces in Uganda. Here are responses to the question in the consultation:

***Question 1:***

*Should the use of TVWS be permitted in Uganda? Please explain your answer*

Response:

Yes, it will allow improved social values and wellbeing of the Uganda population. Using IEEE standards 802.11af and 802.22 will help to implement TVWS usage. Also, IEEE 802.15.4m (now rolled into the IEEE 802.15.4 base standard) could be considered.

***Question 2:***

*What is your view of the scope and proposed requirements and procedures for authorization of service providers that wish to use TVWS as highlighted in sections 3 and 4?*

Response:

No comment.

**Question 3:**

*Do you have any concerns about the proposed technical requirements and standards specified for the use of TVWS in Uganda as highlighted in section 5?*

*If yes, please explain.*

Response:

Higher EIRP could help the connection to more of the population and could be configured in the database scheme.

To add a point-to-point AP (Access Point) to AP allocation with higher power should also be considered. These links would allow to increase the range to help connect more villages and towns.

**Question 4:**

*What is your view on the proposed arrangement for management of the TVWS database by a third party authorized and under the oversight of UCC as highlighted in section 6?*

Response:

Using a third party for the TVWS database management has worked well in other countries, e.g. in the UK. You may want to consider two third parties, for economic reasons and to protect deployments from a single instance of the data base. With this, it will help connect the unconnected in a more robust manor for an increase in the social value of TVWS for Uganda.

***Question 5:***

*Do you have concern(s) with any of the roles assigned to the different stakeholders in the TVWS ecosystem in Uganda as highlighted in section 8?*

Response:

No comment.

***Question 6:***

*Do you have any additional roles that should be included for any of the stakeholders to ensure successful implementation of these guidelines or effective used of TVWS technology in Uganda?*

Response:

No comment.

***Question 7:***

*Do you have any general comments or remarks with respect to the se guidelines?*

Response:

No comment.

**Summary**

We would like to thank the UCC on allowing us the opportunity to respond to their consultation on use of the TV White Spaces in Uganda.

Regards,

By: \_\_\_\_\_\_\_

Paul Nikolich

IEEE 802 LAN/MAN Standards Committee Chairman

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1. This document represents the views of IEEE 802. It does not necessarily represent the views of the IEEE as a whole or the IEEE Standards Association as a whole. [↑](#footnote-ref-1)