

10th March 2021

The Low Power Radio Association (LPRA) exists to represent the interests of the Short Range Devices (SRD) industry around the world. SRD’s are used in a wide range of professional and consumer applications as diverse as remote controls for home automation and car key fobs, wireless smoke alarms, RFID tags, medical telemetry and remote environmental monitoring/control systems.

The LPRA is a trade association formally established as a Company Limited by Guarantee. It is managed by an annually elected council and administered by a professional secretariat. To enable individual members to focus attention on their areas of specific interest, the LPRA is organised into industry sectors.

The LPRA is delighted to respond to this consultation which it please to be of some import. The LPRA thanks the CRA of Qatar for inviting it to comment on the proposed update to the SRD regulations set out in the document, Class Licence for Short Range Devices – Version number (4).

We applaud the access that Qatar allows for Short Range Device (SRD) applications. We also note how many regulations are based on CEPT recommendations, in particular, Rec 70-03. We are surprised, therefore, that no allowance is made for Tracking and Tracing and Data Acquisition applications in the 870 MHz band, and RFID in the 915MHz band, given that this spectrum has been released for SRDs.

We would urge the CRA, therefore, to implement two entries in Rec 70-03, specifically:

Annex 2 (TRACKING, TRACING AND DATA ACQUISITION)

Frequency Band	Power / Magnetic Field	Spectrum access and mitigation requirements	Modulation / maximum occupied bandwidth	Notes	Standard
c2 870-875.6 MHz (note 8)	500 mW e.r.p.	≤ 2.5% duty cycle and APC required (note 1). For ER-GSM protection (873-875.6 MHz, where applicable), the duty cycle is limited to ≤ 0.01% and limited to a maximum transmit on time of 5ms/1s (note 2)	≤ 200 kHz	Data acquisition in data networks. Individual license may be required for Metropolitan/Rural Area Networks. Adaptive Power Control (APC) required. The APC Control is able to reduce a link's transmit power from its maximum to ≤ 5 mW. The frequency band is also identified in Annex 1	EN 303 204

Annex 11 (RADIO FREQUENCY IDENTIFICATION APPLICATIONS)

Frequency Band	Power / Magnetic Field	Spectrum access and mitigation requirements	Modulation / maximum occupied bandwidth	Notes	Standard
b 915-921 MHz	4 W e.r.p. (note 2)	For ER-GSM protection (918-921 MHz, where applicable), DAA is required	≤ 400 kHz	The frequency band is also identified in Annexes 1 and 10. Operation only when necessary to perform the intended operation, i.e. when RFID tags are expected to be present	EN 302 208

Both of these technologies are seeing widespread interest in Europe and we believe that it would be in the interest of Qatari citizens for these entries to be made available to allow new services and applications for their benefit.

We stand available to discuss these proposals at your convenience.

Yours sincerely



Dr Saad Mezzour
Chairman LPRA (Low Power Radio Association)

Phil Bremner
Membership Secretary
LPRA

WWW.LPRA.ORG

Tel: +44 (0) 1268 755 394

Email: business.synergies@me.com