



Variation of 1800MHz mobile licenses.

A consultation on requests for an increase of 3dB
in the maximum permissible base station power.

EE's response to Ofcom's consultation

30th May 2014.



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1. Introduction

EE is pleased to respond to the Ofcom document 'Variation of 1800MHz mobile licenses – A consultation on requests for an increase of 3dB in the maximum permissible base station power'.

EE welcomes the proposal to vary 1800MHz mobile licenses to allow an increase in the maximum permissible base station power by 3dB per carrier for UMTS and 3dB per 5MHz for WiMAX & LTE technologies. We believe this will offer greater flexibility in the rollout of mobile broadband infrastructure and thus allow further optimization of coverage and services for users.

We agree with the Ofcom analysis that other spectrum users are unlikely to be materially affected by the proposed variation.

We agree that no significant competition issues are raised by the proposal to vary the maximum permissible base station power of the 1800MHz licenses.

2. Consultation Question

EE's response to the consultation question is as follows:-

Question 1: Do you agree with the proposal to vary the 1800MHz Public Wireless Network Licenses to increase the maximum permissible downlink transmit power (e.i.r.p) by 3dB from 62dBm per carrier to 65dBm per carrier for UMTS and from 62dBm per 5MHz to 65dBm per 5MHz for LTE and WiMAX technologies?

EE supports the proposed increase in 1800MHz license maximum permissible base station power by 3dB to 65dBm per carrier for UMTS and to 65dBm per 5MHz for LTE and WiMAX technologies. We believe that the increased flexibility this offers will allow further optimisation of coverage and data throughput to the benefit of users.

We support the Ofcom analysis which suggests little material impact on neighbouring spectrum users. We note that Ofcom has considered the worst case widest possible LTE channel of 20MHz in formulating its adjacent channel analysis and considered impacts in the context of international standards and reports. Our own supplier discussions suggest macro equipment adjacent channel emissions performance sufficiently exceeds minimum 3GPP requirements not to be of concern on a 3dB increase in maximum permissible base station power.

We agree that concurrent CSA users are unlikely to be significantly affected. It should be noted in this context that operators are in any event currently deploying uncoordinated GSM and LTE networks without significant interference issues emerging. We do not anticipate that license variation will result in a substantive change in realised interference.

We agree that largely indoor deployed DECT systems are unlikely to be materially affected by the change of permissible 1800MHz base station power. We note that dynamic channel allocation by DECT systems will provide additional protection and that the selectivity of DECT systems is likely to prove more robust than assumed in Ofcom's analysis.

PMSE users may experience a marginal deterioration in interference environment but we agree with the Ofcom analysis that such impact is unlikely to prove significant to ongoing PMSE use.

We would welcome the opportunity to enter into detailed dialogue with the Home Office with respect to any coexistence requirements¹ for their systems deployed at 1790-1798MHz.

We agree that the specific increase in 1800MHz license base station permissible powers should not be of material concern in relation to Public Health England non ionizing radiation limits. We note the Ofcom observation that measured emissions have consistently proved to be significantly below allowed limits and that license variation will only marginally increase emissions in this context.

¹ Annex A4.16, Decision to vary EverythingEverywhere's 1800MHz spectrum licenses to allow use of LTE and WiMAX technologies, Ofcom, 21 August 2012.

In relation to the specific clauses of EE's current license we note that the proposed amendment would be an amendment to paragraph 9 of Schedule 1 "Maximum permissible e.i.r.p" and not to paragraph 10 as suggested in Annex 5 of the consultation document.