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Ofcom's Proposed Annual Plan 2018-19

Nominet is driven by a commitment to use technology to improve connectivity, security and inclusivity online. For 20 years, Nominet has run the .UK internet infrastructure, developing an expertise in the Domain Name System (DNS) that now underpins sophisticated network analytics used by governments and enterprises to mitigate cyber threats. The company provides registry services for top level domains, and is exploring applications for a range of emerging technologies. A profit with a purpose company, Nominet supports initiatives that contribute to a vibrant digital future.

Through its work keeping the .UK namespace secure, Nominet's Emerging Technology team operates in a number of business areas, from providing dynamic spectrum management systems to deliver internet connectivity, to tools and analytics for Internet of Things (IoT) devices and autonomous driving, to selling complex data analytics software, including its ground-breaking network analytics tool for tackling cyber threats.

We welcome the opportunity to contribute our views towards Ofcom's proposed Annual Plan for the year ahead.

Nominet's Position

In recent years Nominet has worked closely with Ofcom in helping to inform and shape the development of TV White space (TVWS) utilization within the United Kingdom. We continue to maintain a strong interest in TVWS as we strongly believe that it has the potential to provide and enhance access to the internet both at home and abroad, and to act as an enabler of the nascent Internet of Things (IoT) industry. Over the past five-year period, Nominet's Emerging Technology team has designed and built a TVWS database and qualified for participation in Ofcom's pilot scheme as a White Spaces Database (WSDB) operator. Our WSDB has been used for a range of purposes including academic research, for exhibits (e.g. at the Glasgow Science Centre during the Commonwealth Games), and in live trial projects.

Following Ofcom's decision to release TV white spaces for use at the end of 2015, Nominet was the first company to successfully complete the qualification process for its WSDB. The WSDB has since been used for a mixture of academic and commercial activities. Most notably, Nominet is providing expertise and access to our geo-location database to internet service providers (ISPs) enabling the first commercial broadband rollouts that employ TVWS technology, on the Isle of Arran off the coast of Scotland, Llanarth in Wales, and recently Loch

Ness in Scotland. As these commercial projects ably demonstrate, we believe that there is a place for TVWS to be included as part of the design of the broadband universal service obligation that DCMS is currently undertaking.

Taking into account the developments that have taken place in relation to TVWS in the last couple of years, we were extremely disappointed to see that Ofcom's Annual Plan for the year ahead made no reference to the need for the existing TVWS Framework to be reviewed during the period. The existing TVWS Framework has been in place since 2015 and is long overdue a comprehensive review and update. We also note that according to the Ofcom statement "Licensing manually configurable white space devices" published in September 2015¹, "*Ofcom intends to review whether a licensing regime is still required by the end of 2018*". We call upon Ofcom to observe and fulfil this stated intention.

There are various technological and operational requirements and developments that should be reflected in the TVWS framework if it is to remain fit for purpose in the years ahead. Taking account of and incorporating these developments will help to nurture and support the technology as it matures. For example, the use of geolocation databases for TVWS has ably demonstrated that this technology can be successfully implemented and is a feasible option in terms of commercial deployments. The result is a long-term benefit in which the effectiveness of spectrum utilization is maximized, and which also provides an important first step for using the approach more widely in other spectrum bands.

It is also worth noting that in recent years several national regulators in overseas territories have decided to investigate and regulate TVWS. Both Colombia and Trinidad and Tobago are recent examples of countries who have implemented frameworks designed around the most up to date developments. Additionally, the Dynamic Spectrum Alliance has recently published an updated model rules for TVWS which provides a proposed framework largely based on the learnings from Ofcom's experiences in this space that other countries are free to take advantage of. In our opinion, Ofcom should review its TVWS Framework during 2018-19 to ensure the UK remains a leading global nation in this space.

Thanks to the effective collaboration that has taken place between the regulator and industry, the UK is currently respected as being at the forefront of TVWS implementation globally and, in order for that position to continue, it is crucial that the 2015 TVWS Framework is reviewed with input from stakeholders. We would be happy to input our expertise as part of this exercise.

For further information please contact:

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https://www.ofcom.org.uk/_data/assets/pdf_file/0023/84209/licensing_manually_configurable_white_space_devices.pdf