

Your response

Question	Your response
<p>Question 1: (Section 3) Do you agree with our proposal for a single authorisation approach for new users to access the three shared access bands and that this will be coordinated by Ofcom and authorised through individual licensing on a per location, first come first served basis? Please give reasons supported by evidence for your views.</p>	<p>Confidential? – N No comment on the proposed authorisation approach. Separately we note that whilst the bands under consideration are naturally aligned to mobile service deployment, subject to limitations, the functionality / capability offered does not support the needs of the Energy Sector, i.e. regional / national access and wide area / high power deployment.</p>
<p>Question 2: (Section 3) Are there other potential uses in the three shared access bands that we have not identified?</p>	<p>No Comment</p>
<p>Question 3: (Section 3) Do you have any other comments on our authorisation proposal for the three shared access bands?</p>	<p>No Comment</p>
<p>Question 4: (Section 3) What is your view on the status of equipment availability that could support DSA and how should DSA be implemented?</p>	<p>No Comment</p>
<p>Question 5: (Section 4) Do you agree with our proposal for the low power and medium power licence? Please give reasons supported by evidence for your views.</p>	<p>No Comment</p>
<p>Question 6: (Section 4) Are there potential uses that may not be enabled by our proposals? Please give reasons supported by evidence for your views.</p>	<p>No Comment</p>
<p>Question 7: (Section 4) Do you agree with our proposal to limit the locations in which medium power licences are available? Please give reasons supported by evidence for your views.</p>	<p>No Comment</p>
<p>Question 8: (Section 4) Do you have other comments on our proposed new licence for the three shared access bands?</p>	<p>No Comment</p>
<p>Question 9: (Section 4) Do you agree that our standard approach to non-technical licence conditions is appropriate? Please give reasons supported by evidence for your views.</p>	<p>Confidential? – N In terms of this proposed non-technical licence conditions for this new Licensing Product the Energy Utilities welcome the commitment that licences would be issued on an indefinite basis as noted in paragraph 4.24 as security of access to spectrum is a key component in unlocking</p>

	<p>the long-term investment that is necessary for the deployment of operational telecommunications systems. However, there does appear to be some ambiguity in terms of Ofcom's proposals, i.e. we observe that Ofcom has the right to give 5 years notice, but of even greater concern are the statements made at the stakeholder workshop that the licences would be issued with a minimum term of three years, but with the potential for the existing licensee to have a right of access during the initial minimum term. These arrangements provide virtually no certainty of access to spectrum and hence are likely to make the arrangements unviable.</p>
<p>Question 10: (Section 4) Are you aware of any issues regarding numbering resources and Mobile Network Codes raised by our proposals which we have not considered here?</p>	<p>No comment</p>
<p>Question 11: (Section 5) Do you agree with the proposed technical licence conditions for the three shared access bands? Please give reasons supported by evidence for your views.</p>	<p>No comment</p>
<p>Question 12: (Section 5) Are there other uses that these bands could enable which could not be facilitated by the proposed technical licence conditions? Please give reasons supported by evidence for your views.</p>	<p>No comment</p>
<p>Question 13: (Section 5) Do you agree with our proposed coordination parameters and methodology? Please give reasons supported by evidence for your views.</p>	<p>No comment</p>
<p>Question 14: (Section 5) What is your view on the potential use of equipment with adaptive antenna technology (AAS) in the 3.8-4.2 GHz band? What additional considerations would we need to take into account in the technical conditions and coordination methodology to support this technology and to ensure that incumbent users remain protected?</p>	<p>No comment</p>
<p>Question 15: (Section 5) Do you agree with our proposal not to assign spectrum to new users in the 3800-3805 MHz band and the 4195-4200 MHz band?</p>	<p>No comment</p>
<p>Question 16: (Section 6) Do you agree with our fee proposal for the new shared access licence?</p>	<p>The cost-based fees approach seems sensible in light of the inherent uncertainty of demand and we are encouraged by Ofcom's commitment to</p>

<p>Please give reasons supported by evidence for your views.</p>	<p>provide certainty in terms of the fees to encourage innovation; 'We recognise the importance of providing certainty to licensees, particularly in bands such as these where there is opportunity for innovation in the uses of the spectrum. We would therefore expect to review these fees only if, following implementation, we considered that:</p> <ul style="list-style-type: none"> • there was a significant misalignment with costs in the future; or • there was evidence of excess demand such that it was appropriate to move to AIP-based fees.'
<p>Question 17: (Section 7) Do you agree with our proposal to change the approach to authorising existing CSA licensees in the 1800 MHz shared spectrum? Please give reasons supported by evidence for your views.</p>	<p>No comment</p>
<p>Question 18: (Section 8) Do you agree with our proposal for the Local Access licence? Please give reasons supported by evidence for your views.</p>	<p>No comment</p>
<p>Question 19: (Section 8) Do you have any other comments on our proposal?</p>	<p>Confidential? – N Against the process depicted does Ofcom intend setting response times for the individual stages to ensure timely engagement by the parties involved particularly the MNOs?</p>
<p>Question 20: (Section 8) What information should Ofcom consider providing for potential applicants in the future and why would this be of use?</p>	<p>Confidential? – Y / N The following detailed information would be key to supporting new entry / systems;</p> <ul style="list-style-type: none"> • A detailed record of all spectrum deployments, current and planned, on a location by location basis; and • A detailed record of all available spectrum assets, current and planned, on a location by location basis.
<p>Question 21: (Section 8) Do you agree with our proposal to have a defined licence period and do you have any comments on the proposed licence term of three years?</p>	<p>Refer to Question 9</p>
<p>Question 22: (Section 8) Do you have any other comments on the proposed Local Access licence terms and conditions?</p>	<p>Confidential? – N We encourage Ofcom to establish the aspects that would constitute a reasonable objection by the incumbent licensee, as it is imperative that</p>

	<p>both the MNOs and the new entrant have clarity on these criteria. This will avoid wasted effort and minimise the amount of non-viable licence applications being submitted.</p>
<p>Question 23: (Section 8) Do you agree with our fee proposal for the new local access licence? Please give reasons supported by evidence for your views.</p>	<p>Confidential? – N As has been noted in response to Question 16 for this approach to be of interest to ‘new entrants’ the costs of spectrum access need to be kept to a minimum and remain stable over the term of the licence.</p>