

March 12, 2018

VIA EMAIL (radiospectrum.award@ofcom.org.uk)

**RE: Award of the 700 MHz and 3.6-3.8 GHz spectrum bands**

Facebook, Inc. is pleased to submit these comments in response to Ofcom's consultation on its spectrum auction to award national licences for spectrum in the 700 MHz and 3.6-3.8 GHz bands.<sup>1</sup> Facebook's mission is to give people the power to build community and bring the world closer together. And connecting people is a critical first step in executing this mission. Today, nearly half of the world's population is still not connected to the Internet.<sup>2</sup> Among those that have connectivity, many are under-connected. Connecting these people is a complicated effort that requires not just bringing network infrastructure to more people, but establishing a regulatory environment that fosters innovation and encourages investment. To do its part, Facebook, working with a range of partners, has launched several initiatives focused on connecting the unconnected and under-connected. For example, Facebook has been investing in research and development efforts in a range of technologies, including mobile, satellite, and aerial such as high altitude platform stations ("HAPS"). Improving connectivity in the United Kingdom and around the world means expanding both the capacity and coverage of wireless networks. To this end, Facebook supports Ofcom's efforts to establish mobile coverage obligations in 700 MHz band spectrum as part of its Award process.

As noted in Facebook's prior comments on this issue,<sup>3</sup> Facebook agrees that Ofcom's upcoming 700 MHz spectrum award "presents an important opportunity for [Ofcom] to improve good quality coverage for people where they live, work, and travel in rural areas across the UK."<sup>4</sup> 700 MHz spectrum is particularly well-suited to expanding mobile broadband coverage to rural areas. As a lower frequency, its propagation characteristics allow 700 MHz band signals to cover large areas with fewer cell sites. Additionally, 700 MHz band signals pass through walls with less attenuation, resulting in better in-building coverage.

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<sup>1</sup> Ofcom, Award of the 700 MHz and 3.6-3.8 GHz spectrum bands (18 Dec. 2018) *available at* [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0019/130726/Award-of-the-700-MHz-and-3.6-3.8-GHz-spectrum-bands.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0019/130726/Award-of-the-700-MHz-and-3.6-3.8-GHz-spectrum-bands.pdf) ("700 MHz Award Consultation").

<sup>2</sup> International Telecommunication Union, Measuring the Information Society Report 2018- Volume 1 at 2 (11 Dec. 2018) *at* <https://www.itu.int/en/ITU-D/Statistics/Documents/publications/misr2018/MISR-2018-Vol-1-E.pdf>.

<sup>3</sup> *See* Letter from Facebook, Inc. to Ofcom, Consultation re: Improving mobile coverage: Proposals of the 700 MHz spectrum band (submitted May 4, 2018).

<sup>4</sup> 700 MHz Award Consultation at 2.

Facebook applauds Ofcom’s efforts here to expand coverage to underserved areas through its proposed obligations, which aim to improve the quality of mobile coverage in most of the rural places where people live and travel.<sup>5</sup> Facebook supports Ofcom’s approach, which is focused on providing consumers with good quality voice and data services. Rural consumers should be able to enjoy the same services that their urban counterparts enjoy, including video streaming. As Ofcom notes, coverage obligations on new mobile licences are one important “lever” that can be used to help address the rural/urban coverage divide.<sup>6</sup> Meeting buildout requirements in the 700 MHz band for 4G/LTE broadband is especially critical as the world is becoming more focused on 5G standards, spectrum, and network deployments, which increases the risk that the digital divide will continue to widen. For this reason, Facebook urges Ofcom to move forward expeditiously with the establishment of coverage obligations as part of its 700 MHz Award process.

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<sup>5</sup> *Id.* at 24.

<sup>6</sup> *Id.* at 28.