

Farndale Free Range Ltd

I focus my brief response in relation to OFCOM's introductory statement, in hopefully plain English rather than technical detail :

*"One of our statutory functions is managing the radio spectrum – the airwaves used by wireless devices like mobile phones. This involves allocating spectrum and **ensuring it is used for the benefit of UK citizens and consumers.** "*

No 1 comment: OFCOM have forgotten to mention delivery of rural broadband via fixed wireless!!

The government is committed to both improving mobile coverage across the UK and also improving rural broadband. My interest in this is that Moorsweb and other rural broadband suppliers would be able to make good use of this frequency spectrum in the longer term future. It could facilitate an expansion of rural fixed wireless broadband as an addition to the current options for rural broadband provision, and therefore be of economic value to the country far beyond its nominal auction value to OFCOM. Therefore I want to take this opportunity to encourage OFCOM/government to consider multiple usage options for this spectrum.

Specifically it is uneconomic to throw large amounts of money at BT/OpenReach to install fibre in the ground or overhead to thousands of rural properties. It is also uneconomic to provide broadband over mobile phone networks as in particular their cost of data supplied is prohibitive . Fixed wireless is a far more economic solution to deliver broadband to large but sparsely populated rural areas, both in terms of radio infrastructure and in terms of running costs for businesses and consumers .

However to do this requires available radio spectrum. Fixed wireless companies across the country have shown how efficient they can be in utilising the very narrow 2.4GHz and 5GHz spectrum to provide thousands of broadband connections across the UK.

In terms of physical electromagnetic properties, this new spectrum lies in between the current 2.4GHz and 5.7GHz . Therefore very simplistically its properties lie between the propagation advantages of 2.4GHz and the data capacity advantages of 5.7GHz and it would be provide a huge capacity increase on a local basis across the country. This relatively short range is one of the reasons that IMHO a thoughtful licensing plan could be developed by OFCOM to use this spectrum in city areas for mobile phone use and rural areas for broadband. A rare win/win/win scenario.

Finally, the mobile companies already have plenty of capacity in their cell towers in rural areas. The reason for lack of mobile coverage is NOT lack of mobile spectrum . It is lack of willingness to pay for building more small towers to use the spectrum they already have.

I appreciate they need more spectrum in densely populated urban areas.

Therefore I strongly urge OFCOM to consider licensing the 3.6-3.8GHz spectrum lightly and making it available to the UK fixed wireless broadband community in rural areas, which will greatly help the government achieve its promises to deliver better rural broadband, but they could still license it to mobile companies in urban areas due it its limited propagation distance. It just needs a more creative approach to licensing.

Regards,
Farndale Free Range Ltd