

Your response

Question	Your response
<p>Question 1: (Section 4) Do you agree with our proposals on the coverage obligations as set out in this section? Please give reasons supported by evidence for your views.</p>	<p>We appreciate the broad ambition to enhance coverage throughout the UK and particularly across the nations. Should Ofcom proceed with an approach of two coverage obligations, then we appreciate that this need to be proportionate considering the costs and benefits. We note that when rolling out new sites needed to meet the obligations there is a potentially important role that satellite infrastructure could play in rolling these out in the most effective way.</p>
<p>Question 2: (Section 5) Do you agree that we have identified the correct competition concerns?</p>	<p>No comments to Question 2.</p>
<p>Question 3: (Section 5) Do you agree with our assessment of these competition concerns, and our proposed measure for addressing them? Please give reasons supported by evidence for your views.</p>	<p>No comments to Question 3.</p>
<p>Question 4: (Section 6) Do you agree with our proposal to proceed with a conventional assignment stage?</p>	<p>No comments to Question 4.</p>
<p>Question 5: (Section 7) Do you agree with our proposal to use a CCA design for this award?</p>	<p>No comments to Question 5.</p>
<p>Question 6: (Section 7) Do you have any comments on the proposed detailed rules for our CCA design?</p>	<p>No comments to Question 6.</p>

<p>Question 7: (Section 8) Do you agree with our proposed approach to coexistence in the 700 MHz band?</p>	<p>No comments to Question 7.</p>
<p>Question 8: (Section 8) Do you have any comments on the proposed licence obligation and guidance note (annex 19)?</p>	<p>No comments to Question 8.</p>
<p>Question 9: (Section 9) Do you agree with our proposed approach to managing interim protections for registered 3.6-3.8 GHz band users?</p>	<p>No comments to Question 9.</p>
<p>Question 10: (Section 9) Do you agree with our 3.6-3.8 GHz in-band restriction zone proposals?</p>	<p>No comments to Question 10.</p>
<p>Question 11: (Section 9) Do you agree with our view that we do not need to include any specific conditions in 3.6-3.8 GHz licences to mitigate the risk of adjacent band interference?</p>	<p>Ofcom proposes to include out-of-band emissions limits above 3.8 GHz in the 3.6–3.8 GHz licences in accordance to CEPT Report 67. However, the harmonized ECC framework in ECC DEC(11)06 advises that the coexistence between FSS earth stations and mobile stations should be carried out on a case-by-case basis. It also states that protection of the licensed spectrum users operating in accordance to prevailing license terms and conditions should be considered by national administrations.</p> <p>Ofcom has already decided that FSS earth stations in the 3.4-3.8 GHz will not be protected in the future. Therefore, we seek clarification on the reasons why Ofcom is proposing to further constrain operations of FSS earth stations by declining their protection also close to the 3.8 GHz edge. As stated also by Ofcom, there are only limited number of FSS earth stations in UK and they are often located in the remote areas which are not so attractive to mobile operators. Therefore, offering protection to the FSS earth stations in the whole 3.8-4.2 band would not considerably constrain mobile deployment. However, for the satellite earth station operators the regulatory certainty achieved through such coordination is crucial. Satellite earth station operators may have only a limited or indirect ability to choose</p>

	<p>which frequencies they receive from the C-band within 3.8-4.2 GHz because they need to connect to a transmitter, often in other continents, via a satellite. Protecting the satellite spectrum throughout the whole frequency range will allow satellite earth station operators to fully utilize their remaining spectrum resource and in part help them to ensure their ability to continue their service provision without a need for additional sites.</p> <p>In conclusion, where there is robust technical evidence that demonstrates a risk of harmful interference into existing satellite earth stations and no mitigations are available, Ofcom should consider suitable protections for those sites in the new mobile licences. This should particularly be the case where 1) long term services are being delivered from those sites and 2) the prospect of new 5G services in these areas is not strong. This would minimise any impact on the value to the spectrum to new licensees while avoiding disruption to existing users.</p>
<p>Question 12: (Section 10) Do you agree with the non-technical conditions that we propose to include in the licences to be issued after the award of the 700 MHz and 3.6-3.8 GHz bands?</p>	<p>We believe that the non-technical conditions proposed needs to consider very carefully by Ofcom and the experience of 4G rollout should be taken into account to ensure that wording is clear about the possibility of both operator and regulator led sharing.</p> <p>In terms of paragraphs 10.26-10.35, Ofcom needs to strike a careful balance between the needs of existing DTT viewers and possible future mobile supplemental downlink services – both of which can use the duplex gap.</p> <p>Ofcom has gone some way to achieving this by maintaining its policy of allowing DTT to access the 700 MHz duplex gap on a licensed basis (in the non-emergence of SDL services). However, it is unclear how one-month rolling notice periods can provide certainty for C-band broadcasters to commit to contract – they would generally plan for advertising and marketing on a one-year basis.</p> <p>In this situation, if broadcasters failed to reach agreement with the licensee(s) to get longer notice, there would be a risk of considerable</p>

	disruption to C band channels.
Question 13: (Section 11) Do you agree with the technical licence conditions we propose?	No comments to Question 13.