



The Scottish Parliament
Pàrlamaid na h-Alba

Stewart Stevenson MSP

Banffshire & Buchan Coast

Stiùbhart MacSteafain BPA

Siorrachd Bhanbh agus Oirthir Bhùchainn

7 March/Am Màrt 2019

Sharon White
Chief Executive
Ofcom
Riverside House
2a Southwark Bridge Rd
London
SE1 9HA

Dear Sharon,

I am writing to respond to Ofcom's proposals on the release of new 5G mobile spectrum and also wish this letter to be considered a submission in response to Ofcom's consultations on "Award of the 700 MHz and 3.6-3.8 GHz spectrum bands" and "Enabling opportunities for innovation", both published on 18 December 2018.

I welcome Ofcom's recent Connected Nations report which rightly identified the challenge of poor coverage in Scotland. While I agree that 5G mobile networks hold real promise for consumers and industry, I am concerned that communities like mine in Banffshire and Buchan Coast risk being left behind. Personally, I have no outdoor coverage from any network generation, and this continues to be an issue for many of my constituents.

Furthermore, 4G data services today are still inaccessible from any of the Mobile Network Operators for more than a fifth of Scotland's landmass. Once again, this is a challenge is particularly felt by rural communities like my own. I suggest Ofcom's proposal to license new 3.6-3.8GHz 5G spectrum on an exclusive, UK-wide basis, as has been done for previous generations, will only widen this digital divide.

Ofcom has already applied considerable resource to clearing spectrum for market, including in the most rural and remote parts of Scotland. It is unfortunate that this valuable and finite national resource be left unused and unproductive in so many of our communities. In order to tap into this important resource, I would call on Ofcom to take a more flexible approach – one that allows for independent businesses and communities to access spectrum where the incumbents are unable to reach through the 'competitive' model of rollout.

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I was encouraged to see Ofcom's proposals to open unused spectrum to independent networks at two existing 4G bands (1800Mhz & 2.3GHz). But it is vital that ambitious proposals for sharing be applied to the 5G 3.6GHz band as well, to ensure these networks are truly futureproof. I suggest sharing, and more open and flexible access to

spectrum is an essential component of enabling connectivity in large rural communities like my own constituency, and in practice may be the only means many will have of accessing 5G, even in the long-term.

It is clear that Ofcom considers such a model possible and that its long-term ambition is for the dynamic allocation of spectrum. I am aware that Ofcom already supports dynamic access to spectrum through its TV White Space initiative, and I hope that Ofcom will consider further how this framework might be applied to 5G as well.

I would be grateful if you could respond to the points I have raised and do so in a manner which I may share with my constituents, particularly regarding why Ofcom has chosen not to apply shared access to the 3.6-3.8Ghz 5G band, which seems well suited for localised coverage infill and to complement, not inhibit, a competitive rollout by the incumbent mobile operators.

I look forward to your reply and reading Ofcom's final proposals for 5G.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stewart Stevenson', written in a cursive style.

STEWART STEVENSON MSP