

Your response

About techUK

techUK represents the companies and technologies that are defining today the world that we will live in tomorrow. In a very real sense techUK represents the future.

At the heart of tech in the UK is an ecosystem of 270,000 companies producing digital technologies, products and services. From east to west, north and south, from enterprise class organisations to established medium-sized businesses, growing small businesses and an exciting generation of tech start-ups: the UK is a hotbed of tech talent and techUK exists to represent the sector in its entirety.

Our role as techUK is to ensure that we seize the potential for good and address the disruptive new challenges that change and innovation always present.

We work to understand the opportunities that technology provides; to support the companies and innovators that can realise those opportunities. This underpins our simple vision to ensure that tech is good for the UK, the UK is good for tech and that tech is good for people.

Question	Your response
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.	techUK agree with 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 agree that these need to be proportionate considering the costs and benefits. techUK notes that when rolling out new sites needed to meet the obligations there is a potentially important role that independent infrastructure providers could play in rolling these out in the most effective way (through enhanced sharing arrangements), particularly important in areas of reduced commercial attraction.
Question 2: (Section 5) Do you agree that we have identified the correct competition concerns?	techUK has not responded to this question.
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.	techUK has not responded to this question.

<p>Question 4: (Section 6) Do you agree with our proposal to proceed with a conventional assignment stage?</p>	<p>techUK has not responded to this question.</p>
<p>Question 5: (Section 7) Do you agree with our proposal to use a CCA design for this award?</p>	<p>techUK has not responded to this question.</p>
<p>Question 6: (Section 7) Do you have any comments on the proposed detailed rules for our CCA design?</p>	<p>techUK has not responded to this question.</p>
<p>Question 7: (Section 8) Do you agree with our proposed approach to coexistence in the 700 MHz band?</p>	<p>techUK believe it is likely that interference into DTT reception via rooftop aerials from mobile base stations will be of the magnitude set out by Ofcom (i.e. 36,000 households), but there is likely to be secondary viewing via set top aerials which will also be impacted. The proposal for new licensees to set out plans for addressing interference into DTT in their licence appears sensible, though techUK would encourage engagement with Digital UK as soon as possible to ensure a joined-up approach to addressing the various forms of interferences between DTT and mobile services</p> <p>Ofcom should observe the general principle that incumbent users should not be faced with incremental costs incurred as a result of change of usage of adjoining bands.</p>
<p>Question 8: (Section 8) Do you have any comments on the proposed licence obligation and guidance note (annex 19)?</p>	<p>techUK has not responded to this question.</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>techUK has not responded to this question.</p>
<p>Question 10: (Section 9) Do you agree with our 3.6-3.8 GHz in-band restriction zone proposals?</p>	<p>techUK has not responded to this question.</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?

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.

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?

techUK welcome the non-technical conditions proposed; we believe Ofcom needs to consider from the experience of 4G rollout and ensure that wording is clear about the possibility of both operator and regulator led sharing.

In terms of paragraphs 10.26-10.35, Ofcom needs to strike a careful balance between the needs of existing DTT viewers of Com 7 & 8 and possible future mobile supplemental downlink services – both of which can use the duplex gap.

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 broadcasters to commit to contract – they would generally plan for advertising and marketing on a one-year basis.

In this situation, if Arqiva failed to reach agreement with the licensee(s) to get longer notice, there would be a risk of considerable disruption as over 20 channels would have to be withdrawn fairly quickly.

Question 13: (Section 11) Do you agree with the technical licence conditions we propose?

techUK has not responded to this question.