



22nd July 2021

Frequency responses in addition to those explicitly requested by Ofcom

In addition to the responses provided by Frequency in regard to the questions asked by Ofcom in the 'Mobile Phone Repeater' consultation paper, Frequency would like to raise the following additional points in license exemption.

Inclusion of 4G TDD bands for Mobile Phone Repeaters under license exemption

We are aware that mobile networks in the UK own and deploy 4G TDD spectrum in bands 38 (2600 MHz) and 40 (2300 MHz). Due to the nature of their frequencies, being high frequency, they often struggle to penetrate far into indoor spaces and are often only stronger around the perimeter of a building internally, or close to the window. We know from speaking to customers who's mobile phones use this frequency, the experience can be very frustrating, leaving those who suffer without the ability to use their device for connectivity as effectively as possible. Dropped calls, audio distortion, and slow data connections are examples of the issues that customers experience as result of poor inbuilding mobile coverage.

Frequency strongly believe that now is the time to start re-evaluating repeater usage in this spectrum, given the use of bands 38 and 40 by mobile networks in the UK, and to consider including within full Ofcom licence exemption. We believe low-power commercial repeaters are available that can use this spectrum and ask Ofcom to consider including these within IR2102

Inclusion of 5G TDD bands for Mobile Phone Repeaters under license exemption

With the introduction of 5G technology by all of the mobile phone networks in the UK, we believe that the 5G frequencies between 3.4 GHz and 3.8 GHz should have a licence exempt repeater option, as these signals will not penetrate buildings well and will only add to the already known poor in-building experience that many of our customer suffer from. We ask Ofcom to consider adding these frequencies to IR2102 to encourage manufacturers to create devices that can boost these mobile phone frequencies.