

## Your response

Question	Your response
<p><b>Question 1: Do you agree that Ofcom should consider working with relevant industry partners to develop a voluntary testing standard, and publishing a list on our website of static indoor mobile phone repeaters that comply with our licence exemption requirements?</b></p>	<p>Yes, though Ofcom should ensure the testing standards required are not prohibitively costly to manufacturers looking to enter the market.</p>
<p><b>Question 2: Do you agree that we should modify IR 2102.1 to allow for 'provider specific' mobile phone repeaters? If you do not agree, please explain your reasons.</b></p>	<p>Yes. The proposed wording of the updates to Ofcom IR2102.1 make it clear that separate constraints are required to be adhered to per MNO.</p>
<p><b>Question 3: Do you agree that we should make 'multi-operator' mobile phone repeaters complying with the technical requirements outlined above (and set out in the draft UK Radio Interface Requirement IR 2102.3 at Annex A3) licence exempt? If you do not agree, please explain your reasons.</b></p>	<p>No.</p> <p>It is not a reasonable expectation for consumers to understand the limitations proposed for multi-operator repeaters when considering individual networks. A consumer is likely to purchase and install a multi-operator repeater requiring coverage on one or more specific operators and may not understand the near/far impact of other networks operating in the chosen bands on their required network.</p> <p>Furthermore, the high proposed power limitations (both in the UL and DL directions) arising from a spectral density limitation of 10dBm/5MHz could lead to concerns over consumers/installers exceeding emissions guidelines. In the case of a fully populated multi-band, multi-operator repeater, consumers could reasonably deploy systems that exceed ICNIRP guidelines without knowledge of RF exposure safety guidelines if multi-operator repeaters were to be made license exempt under the current proposal.</p>
<p><b>Question 4: Do you agree with our provisional view as set out in paragraph 3.48 above? If</b></p>	<p>Consideration should be given to a counter argument that, if more cost-effective 4G only</p>

<p><b>you do not agree, please explain why you think the requirement is not necessary.</b></p>	<p>repeaters were made license exempt, this could appeal to more consumers leading to more repeaters being deployed. If more 4G only repeaters are deployed might the emergency service provision afforded to those with VoLTE devices outweigh the benefit of fewer 3G &amp; 4G devices being deployed?</p> <p>Consideration should also be given to license exemption of 4G only repeaters when deployed in areas where existing 2G/3G services are sufficient to make emergency calls. For example:</p> <ul style="list-style-type: none"> <li>• in buildings where 2G/3G coverage is sufficient to make calls but data rates are poor on 4G.</li> <li>• in areas where emergency call coverage is available on network A but the consumer wishes to improve the 4G coverage of network B.</li> </ul>
<p><b>Question 5: Do you agree that it would not be appropriate to allow the use of licence-exempt repeaters in the 2.6 GHz band? If you do not agree, please explain your reasons.</b></p>	
<p><b>Question 6: Do you agree that we should allow the use of static indoor mobile phone repeaters (on a licence-exempt basis) in the paired 700 MHz mobile band?</b></p>	<p>Yes</p>