

Your response

Question	Your response
<p>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?</p>	<p>Yes, we believe that to do so would help consumers to make an informed choice.</p>
<p>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.</p>	<p>Yes</p>
<p>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.</p>	<p>No Applying the same gain across all channels in a frequency band has the potential to cause a "near/far" issue, whereby gain is reduced to serve a nearby base station and then having insufficient gain for a distant BTS.</p>
<p>Question 4: Do you agree with our provisional view as set out in paragraph 3.48 above? If you do not agree, please explain why you think the requirement is not necessary.</p>	<p>No. It is well known that UK MNOs are looking to switch off 3G (along with 2G fallback). Most handsets are now VoLTE capable, and arguably the risk of being unable to make an emergency call where 4G only is available (without a VoLTE handset, 3G signal not repeated)) is offset by the ability for VoLTE handsets to make emergency calls where otherwise no coverage would be available.</p>
<p>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.</p>	<p>No. Assuming that provider-specific repeaters are deployed, band 7 deployments would only be repeated inside a building at a lower power than the existing OFCOM licenced deployment therefore there should be no potentially harmful effect to ATC/NATS.</p>
<p>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?</p>	<p>Yes</p>



Please complete this form in full and return to mobilephonerepeaters@ofcom.org.uk.

In addition to the points raised above, I would like to take this opportunity to raise the following comments and request that OFCOM kindly consider these as they see appropriate:

We understand that one UK MNO (O2) owns and deploys 4G TDD spectrum at 2600 MHz and 2300 MHz. Low-power commercial repeaters are available that can use this spectrum and ask Ofcom to consider including these within IR2102.

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. We ask Ofcom to consider adding these frequencies to IR2102 to encourage manufacturers to create devices that can boost these mobile phone frequencies.