

UK BROADBAND LIMITED RESPONSE TO OFCOM CONSULTATION ON LICENCE EXEMPTION OF WIRELESS TELEGRAPHY DEVICES

16 JUNE 2011

1. INTRODUCTION

UK Broadband Limited (“**UKB**”) welcomes the opportunity to respond to the Ofcom Consultation on Licence Exemption of Wireless Telegraphy Devices published on 7 April 2011 (the “**Consultation**”) and public discussion of the issues raised.

We set out below in section 2 some information about UKB and in section 3 address the issues raised by the consultation in respect of which we wish to comment.

2. ABOUT UKB

UKB is a wholly owned subsidiary of PCCW, an integrated telecommunications provider offering fixed, mobile, internet and pay TV services to consumers and businesses in Hong Kong. It is one of Asia’s leading information and communication technology companies and through its global division covers more than 1,000 cities and 100 countries across the world with the latest IP, fibre, and satellite transmission technologies.

UKB acquired 3.5GHz spectrum in 2003. Our recent research and development highlighted that the 2x20MHz of 3.5GHz spectrum we then held would not provide sufficient capacity to meet our anticipated demand for broadband mobile services, particularly given increasing industry emphasis on ever wider channel bandwidths e.g. 20MHz+. Therefore, in 2010, UKB acquired the spectrum holdings of Freedom 4 Group at 3.6GHz. It holds in the UK a total of 124MHz of spectrum suitable for innovative new broadband mobile services.

3. ISSUES RAISED BY THE CONSULTATION

Section 5 of the Consultation concerns wireless access terminals in the 3400 to 3800 MHz band. As noted in section 5 UKB holds the 3.5GHz Spectrum Access Licence (3480 to 3500MHz paired with 3580 to 3600MHz) and the 3.6GHz Spectrum Access Licence (3605 to 3689MHz paired with 3925 to 4009MHz) (the “**UKB Bands**”).

Ofcom notes in the Consultation that it is minded to grant licence exemption in the UKB Bands and UKB both welcomes and supports this proposal.

UKB would like to confirm that the proposal set out in the Consultation to meet UKB’s request:

- (a) applies to all types of terminals other than radio access network equipment or base station equipment;
- (b) allows wide channels, at least 20MHz in all parts of the Bands.

UKB would be grateful if Ofcom would confirm this in the Regulations to be made to implement this decision. UKB considers that this clarification would not alter the effect of any impact assessment on these actions.

In addition UKB considers that this clarification for the licence exemption would confirm that the UKB Bands are regulated in an equivalent way to other spectrum used for mobile broadband services.