

Cabinet Secretary for the Rural Economy and Connectivity  
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1 June 2017

Dear Sir,

### **Ofcom Consultation – Mobile Phone Repeaters**

I have pleasure in enclosing the Scottish Government's response to Ofcom's Consultation on Mobile Phone Repeaters at ANNEX A.

The Scottish Government is happy to have a further dialogue with Ofcom to discuss any aspect of our response and I would invite you to contact Harry Emambocus ([harry.emambocus@gov.scot](mailto:harry.emambocus@gov.scot)) in the Scottish Government's Digital Directorate in the first instance.



**FERGUS EWING**

**OFCOM CONSULTATION: MOBILE PHONE REPEATERS – SCOTTISH GOVERNMENT RESPONSE**

1. The Scottish Government welcomes the opportunity to comment on Ofcom's consultation on mobile phone repeaters. Mobile connectivity is an integral part of our World Class digital connectivity vision and we recognise the importance of mobile coverage for rural areas, economically, socially and in terms of resilience. We have agreed an Action Plan with the four Mobile Network Operators (MNOs) to work collaboratively to improve 4G coverage, while laying the groundwork for 5G deployment in Scotland.
2. The Scottish Government is pleased that Ofcom has recognised the potential value of the use of mobile repeaters and their role in improving mobile coverage on a localised basis. In response to this consultation, we wish to offer a number of general high-level comments, on a non-technical basis.
3. The Scottish Government welcomes the work that Ofcom has undertaken in the last few years to assess how licence-exempt use of mobile repeaters could be approved and the analysis which has been completed to determine the acceptable technical conditions for lawful use of these devices to ensure no adverse effects on other customers using the network.
4. The Scottish Government believes that Ofcom's proposals to authorise use of these devices on a license-exempt basis is a valuable way of empowering consumers to take steps to improve their own connectivity, in areas where it may not be commercially viable for MNOs to extend their networks.
5. As such, the Scottish Government broadly supports Ofcom's proposals to authorise the use of both static mobile repeaters intended for indoor use, and low-gain phone repeaters intended for in-vehicle use – both on a licence-exempt basis.
6. Moreover, we encourage to Ofcom to consider working with MNOs to establish where it could be viable to lawfully use these devices over wider geographic distances – as we believe that there is the potential for coverage to be further enhanced. We accept that such use would carry increased risk of interference that could lead to a wider degradation in service in the vicinity, therefore recognise that MNOs would have to fully support – and potentially even provide, devices used in this way. Nevertheless, we encourage wider exploration of the issue – potentially through engagement at the community level involving the MNOs.
7. The Scottish Government encourages Ofcom to work with MNOs on a collaborative basis to appropriately publicise the opportunities afforded by these devices. We also encourage Ofcom to take steps to protect consumers from inadvertently breaking the law by purchasing and operating a device which doesn't meet the allowed technical specifications – as many devices are currently freely available to buy online. Therefore we suggest that Ofcom works with MNOs to provide guidance to customers regarding suitable types of device / and/or industry-approved devices – and also on the types of device which will still remain illegal to use.
8. Finally, the Scottish Government encourages Ofcom to work with MNOs to make customers aware of the limitations of these devices, preferably through clear labelling

of the devices themselves. This should include a reference to a demarcation point between the MNOs' service and the customer equipment to make sure that the customer's expectations are appropriately managed to ensure they are fully aware of where the MNOs' responsibilities end.

**Scottish Government**  
**June 2017**