

May 4, 2018

VIA EMAIL (mobilecoverageconsultation2018@ofcom.org.uk)

RE: Improving mobile coverage: Proposals for coverage obligations in the award of the 700 MHz spectrum band

Facebook, Inc. is pleased to submit these comments in response to Ofcom's consultation on mobile coverage obligations in the 700 MHz band.¹ Facebook's mission is to give people the power to build community and bring the world closer together. And connecting people is a critical first step in executing this mission. Today, nearly four billion people are still not connected to broadband Internet.² Connecting these people—most of whom live in the developing world—is a complicated effort that requires not just bringing network infrastructure to more people, but involves addressing the regulatory environment. To do its part, Facebook, working with a range of partners, has launched several initiatives focused on connecting the unconnected and under-connected.

Spectrum policy and regulations affect both the affordability and availability of the Internet. Improving connectivity in the United Kingdom and around the world means pursuing spectrum policy that maximizes the utilization of this limited resource and promotes the expansion of both the capacity and coverage of wireless networks. To this end, Facebook supports Ofcom's efforts to establish mobile coverage obligations in 700 MHz band spectrum.

Facebook agrees that Ofcom's upcoming 700 MHz spectrum auction is an "important opportunity to improve coverage."³ 700 MHz spectrum is particularly well-suited to expanding mobile broadband coverage to rural areas. As a lower frequency, its propagation characteristics allow 700 MHz band signals to cover large areas with fewer cell sites. Additionally, 700 MHz band signals pass through walls with less attenuation, meaning better in-building coverage.

Facebook applauds Ofcom's efforts to expand coverage to underserved areas through its proposed obligations, which aim to improve both indoor and outdoor 4G coverage in rural

¹ Ofcom, Improving mobile coverage: Proposals for coverage obligations in the award of the 700 MHz spectrum band (9 Mar. 2018) *available at* https://www.ofcom.org.uk/data/assets/pdf_file/0022/111937/consultation-700mhz-coverage-obligations.pdf ("Mobile Coverage Consultation").

² The Inclusive Internet Index: Bridging digital divides at 8 (citing ITU, Key ICT indicators for developed and developing countries and the world, 2005-2016) *available at* <https://theinclusiveinternet.eiu.com/assets/external/downloads/3i-bridging-digital-divides.pdf>.

³ Mobile Coverage Consultation at 12.

areas.⁴ Facebook urges Ofcom to move forward expeditiously with the establishment of coverage obligations.

Respectfully submitted by:

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⁴ *Id.* at 14.