

TELEFÓNICA UK LIMITED RESPONSE TO:

“Ofcom’s proposals to update the technical conditions of mobile licences in the 800 MHz band”

September 2021

I. INTRODUCTION

1. Telefónica UK Limited (“Telefónica”) welcomes the opportunity to respond to Ofcom’s consultation on proposals to update the technical conditions of mobile licences in the 800 MHz band.¹

II. GENERAL COMMENTS

2. As a holder of both Spectrum Access 800MHz and 700MHz licences, we have a direct interest in the proposals that Ofcom has set out in this consultation. We are supportive of these proposals, which will align the 800MHz licences with the 700MHz licences.
3. We focus the remainder of this document on our responses to Ofcom’s specific consultation questions.

III. RESPONSES TO QUESTIONS

Question 1: Do you agree with our proposals to change the in-band power limits contained in the Spectrum Access 800 MHz licence and Ofcom’s assessment of the risk of interference? If you disagree, please provide details.

4. Yes. We agree with Ofcom’s proposals to change the in-band power limits. This will bring the 800MHz band in line with the 700MHz and 900MHz bands. We also agree with Ofcom’s assessment of the risk of interference.

¹https://www.ofcom.org.uk/_data/assets/pdf_file/0026/221948/800-mhz-variation-condoc.pdf

Question 2: Do you agree with our proposals to require licensees to have in place a mitigation scheme to resolve any DTT issues should they occur? If not, please provide details.

5. Yes, we agree. However, we would highlight that having the option to radiate at higher power does not necessarily mean an operator will take advantage of it. This is due to the fact that there are a number of practical factors that will influence the maximum power that an operator can radiate at to provide an optimal service.
6. We are supportive of the approach that Ofcom states at §3.34 of the consultation, that is, if a licensee chooses not to take advantage of the proposed power increase that would be set out in their licence and instead continues to transmit at the current limit of 61 dBm/ (5 MHz) EIRP radio equipment, they will not need to be part of a scheme. If in the future they wish to use the increased in-band power they will need to have one in place before transmitting.

Question 3: Do you agree with the proposals to relax the out-of-band emission limits? If you disagree, please provide details.

7. Yes. We agree with Ofcom's proposals to relax the out-of-band emission limits. This will align the 800MHz band with the 700MHz band and the CEPT specification.

Question 4: Do you agree with the proposals to reintroduce the transitional out-of-band and out-of-block emission limits? If you disagree, please provide details.

8. Yes, we agree with the proposals.
9. We would highlight that, whilst we do not envisage there being any technical issues in terms of radio equipment compliance, our existing equipment is compliant to the technical conditions prevalent at the time of purchase and installation. Therefore we would not retrospectively apply new standards against such existing equipment. In the event of an observed technical/compliance issue in this respect, we would retain the existing equipment i.e. preserve grandfather rights.

Question 5: Do you have any further comments on the technical assessment carried out by Ofcom in Annex 1 of this document?

10. No.

Question 6: Do you agree with Ofcom's assessment on whether to change the emissions limits of the Spectrum Access 800 MHz licences? If you disagree, please provide further information.

11. Yes. We agree with Ofcom's assessment.