

Your response

Question	Your response
Question 1: Do you have any comments on Ofcom's proposed Plan of Work 2023/24?	<p><i>Is this response confidential? – N</i></p> <p>We welcome the emphasis placed in the draft plan of work on enabling wireless services in the broader economy. This section of the plan of work (from para 2.25) rightly emphasises the role wireless services can play for innovation and growth in the wider economy.</p> <p>One aspect of this which is alluded to, but not specifically mentioned, is the increasing</p>

reliance for many forms of critical national infrastructure network on Global Navigation Satellite Systems (GNSS) as a significant enabler and dependency. As many forms of these networks become more reliant on GNSS for accurate time and position, so the vulnerability of the GNSS systems to climatic disruption, deliberate interference and systemic failures is becoming more of a systemic risk to the UK economy. The [Blackett Report](#) in 2018 set out the vulnerabilities very clearly.

We believe that Ofcom should, in its work programme for this year, pay particular attention to how this systemic vulnerability might be mitigated through the use of new wireless services within the UK's critical national infrastructure, and the extent to which there are market-based, private sector solutions available, including through a review of the allocation of radio spectrum usage rights in the 90-110 kHz band.

This focus would also contribute to the objective referred to in paragraphs 2.4 and 2.7 – reliability and resilience of telecoms networks. As mobile networks move to 5G so they will become more vulnerable to GNSS disruption, because of the switch from FDD to TDD transmission which high capacity 5G requires.