

Your response

Question	Your response
Question 1: Do you agree with Ofcom's proposal to vary the licences as requested? If not, please explain why you think it would not be appropriate to vary the licences.	Y
Q2 - Do you have any other comments on the assessment or the factors considered as part of the assessment?	<p>I do not understand how this consultation serves the public interest and think it is a complete waste of public resources, time and effort.</p> <p>The changes proposed are small arcane technical alterations to the licenses that in no way alter the rationale behind the original awards. Consulting the public on them feels both unnecessary and inexpedient to the roll-out of 5G services in the UK.</p> <p>Clearly the changes will impact operators' equipment configuration, and so it is possible that operators are waiting for these license amendments to become official before they can switch on faster services. I cannot see how causing a delay here by consulting serves the public interest.</p> <p>I cannot imagine any argument, contention or reason that any sane person could possibly present that would in any way impact, influence, or materially change Ofcom's clear and obvious decision to agree to these license changes.</p>
Q3 - Do you have any comments on the technical changes?	<p>No, other than they seem completely and blindingly obvious and Ofcom should simply have amended the licenses without consulting, as there is apparently no legislative requirement to do so.</p> <p>Re AAS, the EU Directive has already been decided, and so clearly we should follow. The EU decision will have involved input from MNOs and equipment vendors at the time, who would have provided technical assurance</p>

around the changes, so any technical risks seem very minimal given that MNOs will simply be enabling the functionality of the equipment they are using, some of which presumably comes from Nokia and Ericson who will have a proven track record of trusted engagement at an EU level. Are Ofcom seriously expecting a random member of the public to offer some kind of ground breaking technical insight on this issue that would cause them to reconsider this license alternation? Even if this AAS tech were patented to only one equipment vendor, all the MNOs have requested the change, so what really is the harm in agreeing and why on earth do you need a consultation?

Also, it seems odd that the licenses themselves have to go into such details such that a change like AAS requires a license change from the regulator. Can't Ofcom consider a more flexible licensing approach which allows these kind of small changes to be implemented without a license amendment?

Shouldn't the regulatory framework encourage innovation of wireless technology within the scope of the original award (e.g. here is x range of spectrum, for y purpose – get on it with and innovate so long as you stick to the main principles)??

4G evolved over time to create better services to customers, e.g. Advanced LTE. I would imagine the same will apply to 5G, as standard evolve. Any small technical license amendments to facilitate such enhancements, especially where already directed by EU, and of clear benefit to consumers, should not require a consultation and the regulator should not act to unnecessarily delay implementation of these changes.

It would be quite different if, for example, a change was being proposed that would adversely influence competition in the market because it only benefited one of two MNOs. However, 100% of the big operators have requested this.

I feel that, where possible, Ofcom should operate in such a way so to as to create a level

playing field for the main MNOs to encourage competition. This is a bit off topic, but clearly the best and fastest 4G network now is EE, certainly in urban areas, the EE speeds are always the fastest. EE is also demonstrably the most expensive network, but has the largest market share.... Ofcom should consider the regulatory environment in which this has occurred. To what extent, if any, has 4G spectrum allocation been of particular benefit to EE as opposed to, say, O2? It is also of some concern that EE is now part of incumbent telco BT, and therefore has preferential access to Openreach mast sites at BT exchanges and associated easier access to backhaul fibre. The fact that the most expensive network (EE) is also the most popular is interesting – in what way does that suggest UK regulation of the sector is driving down prices and enabling better services for customers?? Is EE's market lead simply a result of their technical prowess and business acumen, or have Ofcom unintentionally acted in a way to allow them to become the best and beat the competition? Is the playing field level and fair?

Re 5G, a similar thing could happen with Three due to the beneficial contiguous spectrum they now have, but I am a little more supportive of this as I hope Three can develop fixed line broadband services which keep BT on their toes and drive down prices and increase FTTP rollouts. Three could benefit from the kind of CEO presence and marketing approach of T-Mobile USA.

Re the last part of the proposal, the spectrum threshold issue, again this just feels like such a small and obvious thing to do that consulting on it feels completely unnecessary.