

**TELEFÓNICA UK LIMITED RESPONSE TO:**

**“Variation of Spectrum Access licences in the 3400 to 3680 MHz band:**

Ofcom’s consideration of the requests to align the technical conditions of certain 3.4GHz, 3.5GHz and 3.6GHz Spectrum Access licences with European Commission Decision 2019/235”

**May 2019**

## **I. INTRODUCTION**

1. Telefónica UK Limited (“Telefónica”) welcomes the opportunity to respond to Ofcom’s consultation on the Variation of Spectrum Access licences in the 3400 to 3680 MHz band: Ofcom’s consideration of the requests to align the technical conditions of certain 3.4GHz, 3.5GHz and 3.6GHz Spectrum Access licences with European Commission Decision 2019/235<sup>1</sup>.

## **II. GENERAL COMMENTS**

2. Telefónica supports Ofcom’s proposal to align the Spectrum Access licences in the 3400 to 3680 MHz band with the recent European Union (EU) Harmonisation Decision on the 3.4 to 3.8 GHz band. Indeed, we note that the EU decision itself states that the results of CEPT Report 67, should be applied across the Union and implemented by the Member States without delay.
3. Telefónica UK has reviewed CEPT 67 and its associated references and agrees with the CEPT conclusions that TRP limits, as opposed to EIRP limits, should be used to regulate the emissions from an AAS base site.
4. Telefónica believes that amending the technical conditions in the licences will facilitate the deployment and the availability of 5G services in the UK and is therefore in the interests of consumers.
5. We focus the remainder of this document on our responses to Ofcom’s specific consultation questions.

## **III. RESPONSES TO QUESTIONS**

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<sup>1</sup>[https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0025/144880/notice-proposal-vary-3.4-ghz-radio-spectrum-licences.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0025/144880/notice-proposal-vary-3.4-ghz-radio-spectrum-licences.pdf)

*Question 1: Do you agree with Ofcom's proposal to vary the licences as requested?*

6. Yes, we agree with Ofcom's proposal to vary the licences as requested.

*Question 2: Do you have any other comments on the assessment or the factors considered as part of the assessment?*

7. No.

*Question 3: Do you have any comments on the technical changes?*

8. We agree with the technical changes.