

## Your response

Question	Your response
<p>We invite interested parties to consider the initial analysis we set out in this document and to let us know their own views.</p>	<p>Confidential? – N</p> <p>Ofcom are asked to consider the future needs of <b>maritime industry and users</b>, specifically the increasing demand for mobile data coverage to offshore and remote coastal areas.</p> <p>Specific needs for requiring coverage include:</p> <ul style="list-style-type: none"><li>• Autonomous and remotely operated vessels (we note that the Ofcom discussion paper currently only refers to terrestrial vehicles), noting that this sector is expected to see rapid growth over coming years. Requirements are likely to include low latency, relatively high bandwidth coverage of ports and near shore shipping lanes.</li><li>• Aids to Navigation (AtoN) communications. Buoys and other AtoN are increasingly dependent on M2M / IoT mobile data services for system monitoring, command and control. Many of these are located in remote areas with historically poor mobile data coverage.</li><li>• Maritime Safety Information and Safety of Navigation services. Such services are increasingly designed to use mobile data. Mobile data can provide more secure and detailed information (including data on demand) than is possible using the existing 'low bandwidth' maritime VHF data allocations (RR appendix 18). Leisure users, often operating small craft, are in particular understood to benefit from such services with numerous Apps available.</li><li>• Offshore wind industry; a significant proportion of which is within line of sight of shore and able to benefit from mobile data services. (Here we also note the potential for backhaul links to cells located on offshore structures to extend coverage)</li></ul> <p>Care should be taken that future mobile data allocations do not encroach on frequencies internationally allocated to maritime radar and the Global Maritime Distress and</p>

Safety System (GMDSS). Here we note the current difficulties caused by the lack of a guard band between IMT and GMDSS Inmarsat allocations at ~ 1518 MHz.

Mobile service providers may be reluctant to provide maritime coverage as this is likely to be less profitable than coverage of populous areas. Therefore, near shore coverage may need to be mandated to support the maritime industry and provide a safety of life function.

Noting that discussion papers circulated by Ofcom do not make any explicit references to the maritime industry, we wish to highlight the importance of this sector to the UK economy and UK critical national infrastructure. It moves 40% of the UK food supplies, 95% of all goods (by weight) entering and leaving the UK, as well as providing a rapidly increasing contribution to UK green energy supplies. Consequently, we request that due consideration is given to ensuring the future data needs of the maritime industry are adequately protected and supported.