



Vodafone Response to Ofcom consultation: Mobile phone repeaters

Proposed changes to the Wireless
Telegraphy (Mobile Repeater) (Exemption)
Regulations 2022



Varying the repeater regulations

Vodafone welcomes the opportunity to respond to Ofcom's consultation regarding varying the regulations governing mobile repeaters.

It is no secret that we do not agree with the current regulatory regime which makes usage of mobile repeaters a licence-exempt activity. Whilst repeaters have a place in improving indoor mobile coverage, there are many circumstances where their usage is inappropriate and could lead to wider harm to mobile users. For example, the proper way to improve coverage to a shopping centre in a marginal coverage area is to work with mobile networks to install a coverage solution (Distributed Antenna System, DAS): the alternative of independently installing mobile repeater stresses the macro cell network in the area to the detriment of the mobile networks' wider customer bases. By focussing on potential harms through the narrow lens of spectrum interference, Ofcom's regulatory approach has removed the ability for mobile networks to effectively optimise our networks, and risked wider consumer harm. A better solution would have been that mobile repeater usage be permitted, but only with the consent of (or in absence of objection from) the host mobile network operator – this would have allowed appropriate repeater usage to proceed, while providing a mechanism to prevent inappropriate usage.

Notwithstanding this, given the regulatory approach that has been adopted by Ofcom, we agree that the proposed amendments to the regulations are sensible:

- As 3G is being removed from mobile networks, it makes no sense for the regulations to mandate that such signals are repeated. Further, widescale adoption of VoLTE (including support of emergency calling) means that it is disproportionate to mandate that 2G signals are repeated.
- Technology-neutrality is a position that Vodafone has advocated for our own licences to facilitate deployment of 5G, so it is appropriate to ripple this through to the repeater exemption.
- Whilst not a band for which Vodafone has a spectrum licence, we can see no reason to exclude 700MHz from the exemption.

Vodafone UK
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