Research In Motion UK Limited
200 Bath Road
Slough
Berkshire
SL1 3XE

t +44 (0) 1753 667000
f +44 (0) 1753 669970

www.blackberry.com

Marco Marini
Strategy, Chief Economist and Technology Group
Riverside House
2A Southwark Bridge Road
London SE1 9HA

Thursday 7th June

Dear Sir,

Re: Research In Motion response to the UHF strategy consultation

Research In Motion broadly supports the UHF strategy as outlined in the consultation document 'Securing long term benefits from scarce spectrum resources: A strategy for UHF bands IV and V'. We agree that there are significant benefits in making the 700 MHz band available for mobile use in a timely manner, and that now is the best time to review and plan for the future use of these bands.

Mobile Broadband
UHF bands IV and V are in great demand due to their historic use, their unique characteristics and their potential for mobile use. The distinctive propagation and penetration features of 700 MHz spectrum are essential and complementary to the higher frequency bands used for mobile broadband. As there is a very limited amount of this type of spectrum, it must be used in a way that maximizes its unique characteristics.

The global demand for mobile broadband is well-documented and increasing. RIM supports Ofcom's observations in this consultation about the need for more mobile broadband capacity. RIM believes that the forecast rate of growth may be higher than the medium demand scenario shown, if the networks have the spectrum and infrastructure to facilitate growth. Therefore, the resulting need for spectrum would be higher.

RIM agrees that the growth in mobile broadband capacity will deliver significant benefits to citizens and consumers. There are numerous studies showing the benefits of having access to the internet, and wireless mobile access to the internet brings an additional dimension of immediacy in terms of location and time that will increase these benefits further.

The well documented benefits of 700 MHz (in terms of coverage and building penetration) mean that it is critical for the growth of mobile broadband. As the consultation document notes, other actions, such as off-loading and smaller cells, can provide additional capacity. However, in order to meet the expected demand, all of these approaches, including significant additional spectrum, will need to be adopted.

We would strongly agree with Ofcom as to the importance of internationally harmonized spectrum, and that there is global momentum for use of the 700 MHz band for mobile broadband services. A number of other countries have started to introduce these services and our primary concern is that the UK opens up this band in harmony with other markets, so that the appropriate technical requirements can be accommodated in handsets.

Timelines are critical in opening up spectrum for the mobile handset industry, not least in order to create a stable development environment that enables manufacturers to take advantage of economies of scale. The 2018 timetable outlined in the consultation would provide ample time to clarify these requirements, although we prefer a more aggressive time scale.

TV White Space
On the issue of TV white space, we agree that it could be an important way of dynamically sharing spectrum that will give additional access to citizens. It is also a vital first step in proving the validity of sharing spectrum in this way. Use of white space devices in the 600 MHz band must take into account the eventual use of DTT in the band. There should be a clear path for TVWS users once the transition of DTT to 600 MHz is underway – otherwise it could jeopardize the DTT transition and 700 MHz clearing.

Spectrum layout
I would also like to take this opportunity to raise two related points on spectrum layout, which are not covered by the consultation document. Spectrum layout is critical to maximizing the benefits related to handset implementation. Uplink, downlink, duplex spacing and other criteria affect the amount of spectrum that can be accommodated in a handset, as well as its overall performance. These parameters must be kept in mind when considering the overall spectrum plan and which services are accommodated in which bands. Equally, expected improvements in network efficiency and capacity can only be realised if spectrum is organised in large contiguous blocks.

Conclusion
Overall, Research In Motion supports the general thrust of the proposals set out in this consultation to reorganize these bands such that wireless mobile broadband has full access to frequencies in the 700 MHz range. We believe that this strategic approach will deliver positive outcomes for mobile broadband and other services.

Yours sincerely,

Elizabeth Kanter
Director of UK Government Relations
Research in Motion