



Reserving the band 2500– 2690 MHz for the London 2012 Games

Extension of Ofcom's Spectrum Plan for London 2012

Consultation

Publication date: 23 August 2010

Closing Date for Responses: 17 September 2010

Contents

Section		Page
1	Executive Summary	1
2	Introduction	2
3	Analysis and Policy Options	5
Annex		Page
1	Responding to this consultation	9
2	Ofcom's consultation principles	11
3	Consultation response cover sheet	12
4	Consultation question	14

Section 1

Executive Summary

The London 2012 Games take place between 27 July and 9 September 2012. During this period, and the periods immediately before and after the Games, the demand for access to spectrum suited to wireless camera applications will be exceptionally high. The Government has guaranteed to the International Olympic Committee that sufficient spectrum will be made available, but matching demand and supply remains challenging.

Ofcom's Spectrum Plan for the London 2012 Games was published in October 2009¹. Our Spectrum Plan aimed to satisfy demand for spectrum for wireless cameras particularly since we had identified additional spectrum already widely in use for this application. Since then, experience at the Vancouver 2010 Games, further growth in the use of wireless cameras in sports coverage, plans for airborne television coverage and the emergence of 3-dimensional television makes it likely that the spectrum demand may be greater than we had predicted.

Ofcom's Spectrum Plan did not include the band 2500-2690 MHz (the "**2.6 GHz band**") even though the band is highly suitable for wireless cameras and is currently used for this application. The band was not included in Ofcom's Spectrum Plan because of plans to make the band available for commercial use within the timescale of the London 2012 Games. At the time we published the Spectrum Plan we therefore judged the opportunity cost of reserving this spectrum for the Games to be high.

The Government's plans for an award process have now been clarified, and the award of these frequencies is now expected at the end of 2011. In addition, an upgrade programme to radars at 2.7 GHz is required to permit widespread deployment of mobile or broadband services at 2.6 GHz, and this programme is unlikely to be complete before the end of 2012. We therefore believe that the opportunity cost of reserving this band for the London 2012 Games has reduced significantly. There appears little realistic prospect of using 2.6 GHz to deploy new mobile or broadband data services widely to UK citizens and consumers before the Games; and not reserving the band for the London 2012 Games, in the absence of any significant deployment of new mobile or broadband data services, could be a serious loss to the broadcasting coverage of the Games and to citizens and consumers in the UK and world-wide.

Before taking a decision to reserve the 2.6 GHz band for the London 2012 Games we are seeking confirmation from stakeholders that doing so would not impose any significant opportunity cost to UK citizens and consumers, for example by restricting the deployment of new mobile or broadband data services. We believe that our proposal will be relatively uncontentious. We have therefore set the consultation period at four weeks.

¹ <http://stakeholders.ofcom.org.uk/consultations/london2012/statement/>

Section 2

Introduction

Background to the 2.6 GHz Award

- 2.1 On 4 April 2008 Ofcom announced a decision to award spectrum in the 2.6 GHz band. In that announcement we indicated that we expected the application date for the award to be in July 2008². That decision was eventually withdrawn following litigation by various stakeholders and interaction with the Government's Digital Britain project.
- 2.2 In January 2009, the Government published its interim Digital Britain report setting out a series of proposed actions designed to ensure the UK maximised the opportunities for all in the digital age. In that report, the Government identified a complex set of challenges that were hindering the release and use of additional spectrum that could support the deployment of next generation broadband services. Subsequently the Government announced the appointment of an Independent Spectrum Broker to examine whether a solution could be found to overcome the challenges.
- 2.3 The Independent Spectrum Broker's report was published in May 2009³ and the Government's response to it formed part of the Digital Britain final report published in June 2009⁴. Following the Independent Spectrum Broker's final report, the Government decided that the proposals represented a basis for further action and that it would seek to do this through a formal Direction to Ofcom on the release of the 2.6 GHz band among other matters. Subsequently, the Government issued a consultation document on the proposed Direction and this was published on 16 October 2009, with a closing date for responses of 8 January 2010.
- 2.4 On 27 July 2010, the Government laid a draft Direction in Parliament, superseding a draft which had been previously laid on 23 March 2010. The new draft includes the requirement for Ofcom to hold an auction of these frequencies as soon as possible after carrying out a competition assessment in relation to mobile electronic communication services markets following the auction. The Government's expectation is that the auction will take place at the end of 2011⁵.

Background to the Spectrum Plan for the London 2012 Games

- 2.5 On 19 October 2009 we published the Spectrum Plan for the London 2012 Games⁶. This Statement sets out our spectrum plan for wireless communications and includes high-level approaches to licensing (authorisation) and interference management.

² http://stakeholders.ofcom.org.uk/spectrum/spectrum-awards/awards-in-preparation/award_2010/

³ Report from the Independent Spectrum Broker : findings and policy proposals

⁴ Digital Britain, Final Report, June 2009 URN 09/1026

⁵ <http://nds.coi.gov.uk/content/Detail.aspx?ReleaseID=414707&NewsAreaID=2>

⁶ <http://stakeholders.ofcom.org.uk/consultations/london2012/statement/>

- 2.6 Ofcom is responsible for organising a full spectrum plan for the London 2012 Games, for arranging all the licences in good time in support of the plan and for ensuring all key wireless services are kept free from harmful interference.
- 2.7 Our consultation document of May 2009 set out a draft spectrum plan to meet the Government's spectrum guarantees to the International Olympic Committee (IOC) with minimum disruption to other users. Responses to this consultation indicated that there would be a high level of demand for spectrum in the 2-4 GHz range for use by wireless cameras, and that Ofcom should seek access to more spectrum in this range.
- 2.8 The 2.6 GHz band is used at present by wireless cameras, co-ordinated through the Programme Making and Special Events (PMSE) processes managed on Ofcom's behalf by JFMG⁷. Ofcom has revoked the rolling PMSE licences in this band, and has replaced them with short term licences. PMSE licensees will be given three months' notice of the spectrum becoming unavailable for PMSE use. The band is also used for some Test and Development licences, granted on a non-interference, unprotected basis.

Impact Assessment

- 2.9 Impact Assessments (IAs) provide a valuable way of assessing different options for regulation and showing why the preferred option was chosen. They form part of best practice in policy-making. This is reflected in Section 7 of the Communications Act 2003, which states that we generally have to carry out IAs where our proposals would be likely to have a significant effect on businesses or the general public or when there is a major change in Ofcom's activities. As a matter of policy, Ofcom is committed to carrying out and publishing impact assessments in relation to the great majority of our policy decisions. For further information about our approach to IAs, see the guidelines Better Policy-Making⁸.
- 2.10 The analysis presented in this document constitutes an IA for our proposal to reserve the whole of the 2.6 GHz band for the London 2012 Games. We have given qualitative assessments of the effects of our proposal and we are seeking confirmation from stakeholders that doing so would not impose any significant opportunity cost to UK citizens and consumers, for example by restricting the deployment of new mobile or broadband data services.
- 2.11 We are required by statute to have due regard to any potential impacts our proposals may have on race, disability and gender equality – an Equality Impact Assessment (EIA) is our way of fulfilling this obligation and ensuring that we meet our duty of furthering the interests of citizens and consumers. Ofcom will also consider any relevant wider equality issues. Three potential impacts on equality have been identified in relation to Spectrum Plan for the London 2012 Games⁹ but none of these is relevant to the 2.6 GHz band.
- 2.12 Our proposal to reserve the 2.6 GHz band for the London 2012 Games does not require us to revoke or vary existing spectrum licences to meet the requirements of the Games. If Ofcom decides to proceed with the reservation of the 2.6 GHz band, this will not prevent us from proceeding with the award of new licences before the Games. However, it will be necessary to include in any awards a temporary

⁷ <http://www.jfmg.co.uk/>

⁸ http://www.ofcom.org.uk/consult/policy_making/guidelines.pdf.

⁹ <http://stakeholders.ofcom.org.uk/binaries/consultations/london2012/statement/statement.pdf>

exclusion of the operation of new services. Our working assumption is that access to spectrum will be needed from 28 June 2012 to 23 September 2012 (i.e., a month before the Olympic Games opening ceremony until two weeks after the closing ceremony of the Paralympic Games) at the London venues for the Games. To provide the necessary protection from interference the reservation would extend to the London area bounded by the M25 motorway. Ofcom will retain the right to grant concurrent licences to other users for this geographical area during the same period if they can be accommodated without creating an undue risk of interference. Other geographical locations may need to be reserved depending on the demand for frequencies at other Olympic venues.

- 2.13 It may be possible to grant licences for non-operational trials and tests of new mobile or broadband data services during the period of the Games if these can be co-ordinated with wireless camera use within the area bounded by the M25 motorway or other reserved locations.
- 2.14 As parts of the spectrum plan and our policies on licensing and interference management during the London 2012 Games will evolve over time, we intend to monitor equality issues in relation to our work on the London 2012 Games on an on-going basis.

Section 3

Analysis and Policy Options

Why Ofcom did not include 2.6 GHz in the Spectrum Plan

- 3.1 The 2.6 GHz band is expected to play an important role in the development of advanced mobile data services and the band is of particular interest to operators looking to adopt the next generation of wireless data technologies such as Long Term Evolution (LTE) and WiMAX. Making the band available to new licensees will support the introduction of innovative mobile services and foster competition in the provision of these services in the UK. This has the potential to deliver substantial benefits for consumers and the UK economy as a whole, as well as enabling the UK to remain in the vanguard of European mobile development and deployment.
- 3.2 Similarly, Government has taken the view¹⁰ that “widespread next generation mobile broadband services, capable of delivering data at speeds considerably in excess of today’s offerings, will be of considerable value to both consumers and business.” From a business perspective, the Government said that the “use of information and communication technologies has been proven to deliver productivity benefits. Allowing for high speed connectivity on the move will only increase the benefits to be gained. For the consumer, access to real time information whilst on the move will be invaluable as well as offering a considerable market opportunity to creative industries wishing to develop content.”
- 3.3 Ofcom had previously taken the view that an award could be made in time for there to be a good prospect of a significant deployment of new mobile or broadband data services, handsets and customers before the Games. In the Spectrum Plan, therefore, Ofcom judged the opportunity cost of reserving this spectrum for the Games to be high and did not include access to the 2.6 GHz band.

Demand forecasting

- 3.4 In our May 2009 Draft Spectrum Plan (section 7)¹¹ we set out our assumptions for wireless cameras. We said we believe we will need to accommodate a peak of up to 75 wireless-camera channels in simultaneous use. This is based on:
- a peak of 36 channels experienced at the Beijing Games;
 - the scope to reuse spectrum between the Olympic Park, the River Zone, the Central Zone and Eton Dorney; and
 - a generous allowance for growth given how production values (e.g. point-of-view cameras) have taken advantage of developments in technology.
- 3.5 We also planned on the basis that using adjacent channels is not possible without causing harmful interference, leading to a maximum peak requirement for 149 channels for wireless cameras if the channels are all contiguous. We said that this would be overly generous as we anticipate we can reduce the frequency offset

¹⁰ <http://www.bis.gov.uk/assets/biscore/corporate/docs/digital-britain/factsheets/spectrum-modernisation.pdf>

¹¹ <http://stakeholders.ofcom.org.uk/binaries/consultations/london2012/london2012.pdf>

between two co-located adjacent channels to 5 MHz (and even less as the cameras move away from each other geographically) in practice.

- 3.6 We anticipate airborne use of some channels to allow wireless camera coverage of wide-area events (e.g. the marathon). This may involve use of helicopters and aeroplanes. Their operational altitude means opportunities for spectrum reuse are greatly diminished, while the range of usable spectrum is itself limited because of the mobility of these links and difficulties in obtaining line of sight for communications. The radiated power required for the uplink (from a car/motorcycle to a helicopter/aeroplane) is also much higher as the required link can be obstructed by terrain and clutter and the transmitter and receiver may not always be in the same alignment (i.e. at the vertical of the ground vehicle).
- 3.7 Based on the experience of the Beijing Games, we had forecast demand for three airborne wireless channels in simultaneous use.
- 3.8 Ofcom's Spectrum Plan for the London 2012 Games identified a number of bands held or managed by the public sector that could be made available to wireless camera users during Games-time. The capacity we identified from these bands would satisfy demand as then calculated, which was based on the experience of the Beijing 2008 Games with an increment of approximately 20%. Since then, experience at the Vancouver 2010 Games, further growth in the use of wireless cameras in sports coverage, plans for airborne coverage and the emergence of 3-dimensional television (3D TV) makes it likely that the spectrum demand will be greater than we had expected. We are also conscious of the needs of wireless camera users who are not members of the Olympic Family – for example non-rights holding broadcasters and the business-as-usual of news organisations covering other events in London.
- 3.9 No precise quantification of the increased demand can be undertaken until we have engaged with the broadcasters from whom the demand will come and this is not possible until later in 2010. However, broadcasters' responses to our 2009 consultation indicated that they strongly prefer to use capacity in the 2-4 GHz range. Our assessment of the impact of reserving the 2.6 GHz band for the London 2012 Games is therefore qualitative at this stage, but we judge that demand for these frequencies for wireless camera use will be strong.

Reserving the 2.6 GHz band

- 3.10 The draft Government Direction laid before Parliament on 27 July 2010 requires Ofcom to hold an auction for licences to use, amongst other things, the 2.6GHz band as soon as possible after carrying out a competition assessment in relation to mobile electronic communications services markets following the auction. There are significant complexities in preparing for the auction and the Government's expectation is that an award of the 2.6 GHz band will take place at the end of 2011, approximately nine months from the end of the Games. Ofcom's view is that the prospect of any significant deployment of next-generation wireless data technologies such as LTE and WiMAX in this timescale is low, suggesting a very low opportunity cost from reserving the band for the Games.
- 3.11 If the 2.6 GHz band was available for wireless cameras during the London 2012 Games this would be a significant benefit to the broadcasting coverage of the Games and to citizens in the UK and world-wide. In order to reap this benefit, users would need to know what bands were available well in advance, so that they can plan for the equipment they need. If the entire band was reserved for wireless

camera applications, this would provide up to an additional 10x20 MHz analogue Frequency Modulation (FM) channels or up to an additional 19x10 MHz digital Digital Video Broadcasting –Terrestrial (DVB-T) channels.

- 3.12 Reserving the band for the Games will not prevent Ofcom from proceeding with the auction and granting new licences to the winners. But the terms and conditions of the award and the subsequent licences would enable Ofcom to grant concurrent licences to other users for Games purposes; and would restrict the award licensees from using the spectrum in locations and at times needed for the Games.
- 3.13 The period during which such licences would be granted would be from 28 June 2012 to 23 September 2012 (i.e., a month before the Olympic Games opening ceremony until two weeks after the closing ceremony of the Paralympic Games). Broadcasters accredited to the Games will be setting up and testing a month before the opening ceremony; and there may be continuing broadcaster interest in the de-commissioning period after the Games.
- 3.14 Geographically the area of high demand will be at the Olympic Park and the other London venues. To allow careful co-ordination of wireless camera use, therefore, the reservation would extend to the area bounded by the M25 motorway. Other geographical locations may need to be reserved depending on the demand for frequencies at other Olympic venues.

Reserving the centre gap

- 3.15 Ofcom's proposals for the award of the 2.6 GHz band have in the past included the possibility that the centre gap of 50 MHz be released earlier than the remaining 2x70 MHz. The availability of equipment using technologies such as WiMAX made deployment of next-generation wireless services before the end of the Games more likely, suggesting some opportunity cost if Ofcom reserved the whole of the 2.6 GHz band for the Games. However, in the light of the Government's draft Direction we do not now expect a separate, earlier award of the centre gap frequencies.

Radar remediation programme

- 3.16 On 11 December 2009 Ofcom published information on the coexistence of S Band radar systems and adjacent future services¹². This provided a further update on the emerging implications of the sensitivity of existing radars in the S Band (2.7-3.1 GHz) to transmissions in the two adjacent bands (the 2.6 GHz band and, potentially, the 3.4-3.8 GHz band); and a planned programme of remedial action to make it possible to implement large-scale mobile services in the 2.6 GHz band. The indicative timeline for the programme envisaged national availability being achieved as soon as practicable, but potentially not before the end of 2012 or even 2013. This timeline has not advanced since then. There is therefore little likelihood that large-scale mobile services could be operated at 2.6 GHz in 2012.

Trials and non-operational testing

- 3.17 The provision of services to the Olympic Family would take precedence over other uses of the spectrum during Games-time. Nevertheless it may be possible to share the band with other uses if these are carefully co-ordinated.

¹² <http://stakeholders.ofcom.org.uk/binaries/spectrum/spectrum-awards/awards-in-preparation/infoupdate.pdf>

- 3.18 Wireless cameras using the 2.6 GHz band are normally administered and co-ordinated by JFMG. As part of the licensing and assignment process for the Games, Ofcom is developing the technical means to co-ordinate Games use with other users nearby, including the ability to coordinate assignments so that interference is minimised and optimal use is made of the available spectrum. This will also include the technical means to co-ordinate with other uses of the 2.6 GHz band during the Games. It may therefore be possible to grant licences for non-operational trials and tests of new mobile or broadband data services if these can be co-ordinated with wireless camera use.
- 3.19 Ofcom is therefore of the view that the opportunity cost arising from non-operational licensing for trials and testing purposes in the 2.6 GHz band will be very low or zero.

The 2.6 GHz award and terms and conditions

- 3.20 If Ofcom decides to proceed with the reservation of the 2.6 GHz band for the Games, this will not prevent Ofcom from proceeding with the award. However, in the terms and conditions of the award and in licences issued as a result it will be necessary to exclude temporarily the operation of the new services between 28 June and 23 September 2012 at the London venues for the Games and surrounding areas. This will mean that the reservation would extend to the area bounded by the M25 motorway. Other geographical locations may need to be reserved depending on the demand for frequencies at other Olympic venues.

Consultation process

- 3.21 In the light of the Government Direction, the expected timetable for the award and our current understanding of the plans of the organisations likely to be interested in using the 2.6 GHz band we believe that our proposal to reserve it for wireless camera use at the London 2012 Games will be relatively uncontentious. We have therefore set the consultation period at four weeks. The consultation question is:

Q/ Do you agree that reserving the 2.6 GHz band for wireless cameras for the London 2012 Games venues during the period from 28 June 2012 until 23 September 2012 will impose little opportunity cost on deploying new mobile or broadband data services to UK citizens and consumers? Please give reasons and evidence in support of your answer.

Annex 1

Responding to this consultation

How to respond

- A1.1 Ofcom invites written views and comments on the issues raised in this document, to be made **by 5pm on 17 September 2010**.
- A1.2 Ofcom strongly prefers to receive responses using the online web form at <http://stakeholders.ofcom.org.uk/consultations/band-2500-2690-london-2012-games> as this helps us to process the responses quickly and efficiently. We would also be grateful if you could assist us by completing a response cover sheet (see Annex 3), to indicate whether or not there are confidentiality issues. This response coversheet is incorporated into the online web form questionnaire.
- A1.3 For larger consultation responses - particularly those with supporting charts, tables or other data - please email Olympics.spectrum@ofcom.org.uk attaching your response in Microsoft Word format, together with a consultation response coversheet.
- A1.4 Responses may alternatively be posted or faxed to the address below, marked with the title of the consultation.
- Steve Jones
Spectrum Policy Group
Riverside House
2A Southwark Bridge Road
London SE1 9HA
- Fax: 020 7783 4303
- A1.5 Note that we do not need a hard copy in addition to an electronic version. Ofcom will acknowledge receipt of responses if they are submitted using the online web form but not otherwise.
- A1.6 It would be helpful if your response could include direct answers to the question asked in this document at Annex 4. It would also help if you can explain why you hold your views and how Ofcom's proposals would impact on you.

Further information

- A1.7 If you want to discuss the issues and questions raised in this consultation, or need advice on the appropriate form of response, please contact Steve Jones on 020 7783 4524.

Confidentiality

- A1.8 We believe it is important for everyone interested in an issue to see the views expressed by consultation respondents. We will therefore usually publish all responses on our website, www.ofcom.org.uk, ideally on receipt. If you think your response should be kept confidential, can you please specify what part or whether all of your response should be kept confidential, and specify why. Please also place

such parts in a separate annex. If someone asks us to keep part or all of a response confidential, we will treat this request seriously and will try to respect this. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.

- A1.9 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's approach on intellectual property rights is explained further on its website at <http://www.ofcom.org.uk/about/accoun/disclaimer/>

Next steps

- A1.10 Following the end of the consultation period, Ofcom intends to publish a statement in October 2010.
- A1.11 Please note that you can register to receive free mail Updates alerting you to the publications of relevant Ofcom documents. For more details please see: http://www.ofcom.org.uk/static/subscribe/select_list.htm

Ofcom's consultation processes

- A1.12 Ofcom seeks to ensure that responding to a consultation is easy as possible. For more information please see our consultation principles in Annex 2.
- A1.13 If you have any comments or suggestions on how Ofcom conducts its consultations, please call our consultation helpdesk on 020 7981 3003 or e-mail us at consult@ofcom.org.uk. We would particularly welcome thoughts on how Ofcom could more effectively seek the views of those groups or individuals, such as small businesses or particular types of residential consumers, who are less likely to give their opinions through a formal consultation.
- A1.14 If you would like to discuss these issues or Ofcom's consultation processes more generally you can alternatively contact Vicki Nash, Director Scotland, who is Ofcom's consultation champion:

Vicki Nash
Ofcom
Sutherland House
149 St. Vincent Street
Glasgow G2 5NW

Tel: 0141 229 7401
Fax: 0141 229 7433

Email vicki.nash@ofcom.org.uk

Annex 2

Ofcom's consultation principles

A2.1 Ofcom has published the following seven principles that it will follow for each public written consultation:

Before the consultation

A2.2 Where possible, we will hold informal talks with people and organisations before announcing a big consultation to find out whether we are thinking in the right direction. If we do not have enough time to do this, we will hold an open meeting to explain our proposals shortly after announcing the consultation.

During the consultation

A2.3 We will be clear about who we are consulting, why, on what questions and for how long.

A2.4 We will make the consultation document as short and simple as possible with a summary of no more than two pages. We will try to make it as easy as possible to give us a written response. If the consultation is complicated, we may provide a shortened Plain English Guide for smaller organisations or individuals who would otherwise not be able to spare the time to share their views.

A2.5 We will consult for up to 10 weeks depending on the potential impact of our proposals.

A2.6 A person within Ofcom will be in charge of making sure we follow our own guidelines and reach out to the largest number of people and organisations interested in the outcome of our decisions. Ofcom's 'Consultation Champion' will also be the main person to contact with views on the way we run our consultations.

A2.7 If we are not able to follow one of these principles, we will explain why.

After the consultation

A2.8 We think it is important for everyone interested in an issue to see the views of others during a consultation. We would usually publish all the responses we have received on our website. In our statement, we will give reasons for our decisions and will give an account of how the views of those concerned helped shape those decisions.

Annex 3

Consultation response cover sheet

- A3.1 In the interests of transparency and good regulatory practice, we will publish all consultation responses in full on our website, www.ofcom.org.uk.
- A3.2 We have produced a coversheet for responses (see below) and would be very grateful if you could send one with your response (this is incorporated into the online web form if you respond in this way). This will speed up our processing of responses, and help to maintain confidentiality where appropriate.
- A3.3 The quality of consultation can be enhanced by publishing responses before the consultation period closes. In particular, this can help those individuals and organisations with limited resources or familiarity with the issues to respond in a more informed way. Therefore Ofcom would encourage respondents to complete their coversheet in a way that allows Ofcom to publish their responses upon receipt, rather than waiting until the consultation period has ended.
- A3.4 We strongly prefer to receive responses via the online web form which incorporates the coversheet. If you are responding via email, post or fax you can download an electronic copy of this coversheet in Word or RTF format from the ‘Consultations’ section of our website at www.ofcom.org.uk/consult/.
- A3.5 Please put any parts of your response you consider should be kept confidential in a separate annex to your response and include your reasons why this part of your response should not be published. This can include information such as your personal background and experience. If you want your name, address, other contact details, or job title to remain confidential, please provide them in your cover sheet only, so that we don’t have to edit your response.

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing

Name/contact details/job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts?

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

Annex 4

Consultation question

Reserving the 2500 – 2690 MHz band for the London 2012 Games

- A4.1 Before taking a decision to reserve the 2.6 GHz band for the London 2012 Games we are seeking confirmation from stakeholders that doing so would not impose any significant opportunity cost to UK citizens and consumers, for example by restricting the deployment of new mobile or broadband data services to UK citizens and consumers.

Q/ Do you agree that reserving the 2.6 GHz band for wireless cameras for the London 2012 Games venues during the period from 28 June until 23 September 2012 will impose little opportunity cost on deploying new mobile or broadband data services to UK citizens and consumers? Please give reasons and evidence in support of your answer.