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President Ben Fogle Chief Executive Kathy Moore

6-7 Barnard Mews London SW11 1QU
Telephone 020 7924 4077
Fax 020 7924 5761
Email info@cnp.org.uk
Web <http://www.cnp.org.uk>

Emma Taylor
Floor 4 (Competition Group)
Ofcom
Riverside House
2A Southwark Bridge Road
London
SE1 9HA

By email to mobile@ofcom.org.uk

Dear Emma

Ofcom's mobile sector assessment – second consultation

The Campaign for National Parks (CNP) welcomes the opportunity to respond to the above consultation. CNP is the national charity that campaigns to protect and promote National Parks for the benefit and quiet enjoyment of all.

Mobile coverage in remote rural areas like National Parks is important to a number of sectors including the emergency services, local communities, visitors and businesses. Its importance is likely to increase given the growing demand for mobile broadband and the role that this might play in helping everyone in the UK to be within reach of a broadband service by 2012.

However, mobile phone infrastructure can have a detrimental impact on National Parks and the Government has introduced specific guidance to control this. For example, paragraph 8 of Planning Policy Guidance Note no 8¹ states that in National Parks and Areas of Outstanding Natural Beauty proposals should be sensitively designed and sited and the developer must demonstrate that there are no suitable alternative locations. The maps of 'not-spot' areas for 3G coverage show a high degree of commonality with National Parks which we would suggest is due to a number of environmental, social and economic considerations (for example, their environmentally sensitive nature, physical challenges presented by their topography and lower demand for mobile services compared to more populated areas).

Until recently, the competition between companies emanating from their licence obligations has meant that they have been reluctant to share networks or infrastructure unless it has been absolutely necessary (i.e. the only way to get planning permission) rather than this being the basis on which a network is planned.

CNP would like the introduction of roaming in rural areas such as National Parks to be given serious consideration as we believe that this would deliver improved coverage for customers and reduce the planning burden on these environmentally sensitive areas. CNP therefore welcomes Ofcom's reference to national and regional roaming in this consultation paper but is disappointed that the way forward appears to lie in further spectrum liberalisation and release rather than in any serious investigation of roaming.

¹ <http://www.communities.gov.uk/documents/planningandbuilding/pdf/ppg8.pdf>

We understand that more recently companies have been discussing network sharing (for example, between Vodafone and O2 on pooling their networks, and between Orange and T-Mobile and 3 about Orange joining their network sharing venture). CNP considers that such initiatives ought to be encouraged and supported by Ofcom as part of its proposed approach to mobile coverage. Promoting such best practice, especially in environmentally sensitive areas such as National Parks where further planning permissions are likely to be scrutinised very closely, would help to increase coverage and the options available to consumers.

CNP does not believe that increased network sharing would undermine the competitive basis of the licenses, as all five companies would continue to compete under their own brand names, and competition between companies would merely shift from the geographical location of infrastructure to the end of pipe package provided to consumers.

Combining networks could have wider benefits as it should extend the reach of mobile broadband into rural areas more quickly. This could allow companies to reduce the existing 51,000 base stations by eliminating duplication, which in turn could reduce costs and lead to cheaper calls and internet services, which would be of benefit to consumers.

In summary, CNP considers that Ofcom should:

- Undertake serious investigation of the role that national roaming might play in improving coverage and reducing the need for infrastructure in remote rural areas such as National Parks
- Encourage companies to share networks, especially in remote rural areas such as National Parks

Please do not hesitate to contact me should you require clarification of any of the above.

Yours sincerely

Ruth Chambers

Ruth Chambers
Deputy Chief Executive and Head of Policy

Tel 020 7924 4077 ext. 222
Email ruth@cnp.org.uk