What do you want Ofcom to keep confidential?:

Keep name confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Question 1.1: What are the implications of market change for mobile and wireless services?:

NA

Question 1.2: How are citizens and consumers affected by developments in the mobile sector?:

NA

Question 1.3: What are the purposes of mobile regulation, and where should its focus lie?:

1) Efficient and fair use of limited natural resource i.e. RF spectrum.
2) Self-financing: all regulatory activities should be fundable by license revenue etc rather than taxation of the public as a whole

Question 1.4: What is the scope for deregulation, competition and innovation in the mobile sector?:

NA

Question 3.1: What do you think are the features of a well-functioning mobile market? What evidence do you see that those features are present in the UK market?:

1) High rate of innovative service offerings
2) Fast adoption rate of innovative service offerings (not the same as high absolute

adoption)
3) Competitive pricing

Question 3.2: What measures are most appropriate to assess whether the mobile sector is performing well for citizens and consumers?:

1) World leading technology deployment
2) Globally competitive pricing (as a % of GDP/capita)
3) High mobile application development and success rate

Question 3.3: How will market dynamics change as a result of trends such as availability of new spectrum, mobile broadband and new ways of delivering voice services?:

NA

Question 4.1: What is your experience, as an individual consumer or an organisation that uses mobile services?:

1) Overpriced
2) Lagging in terms of speed and services (cf Japan and Korea)

Question 4.2: How should regulators and policy-makers respond to signs of rising consumer concern? :

Reducing barriers to new entrants i.e. threat of potential new competitors

Question 4.3: What are the important factors to consider in striking a balance between protecting mobile consumers and enabling markets to work flexibly? Have we got this balance right in today?s mobile market?:

NA

Question 5.1: How does the use of mobile services affect our participation as citizens in society?:

NA

Question 5.2: What factors should we take into account in thinking about access and inclusion issues in mobile markets?:

NA

Question 5.3: What factors should we take into account in thinking about new services, and how those services may affect issues like protection of children, privacy and security?:

No humanly observable connection between either handset location and telephone number or telephone number and subscriber ID. Other factors are the responsibility of the end user or can be solved by market mechanisms.

Question 5.4: Have you been affected by issues about coverage or 'not spots?? How has it affected you?:

Yes, this is particularly frustrating and ultimately has led me to use fixed over mobile services where possible i.e. it has directly hampered my own adoption of mobile services.

Question 7.1: What do you see as the most influential trends and features of mobile and wireless markets in future?:

Thin cliet computing i.e. a significant number of PCs with specs to support only a web-browser accessing distributed applications and files.

Self-regulating networks composed of two-way "handsets" i.e. each user is both a recipient of RF frequency and also a mobile repeater station for other users.

Question 7.2: What new policy and regulatory challenges could the trends identified in this section bring? Which policy and regulatory challenges could they address?:

Content authorship - particularly of SW (distributed applications)

"Network" ownership i.e. who is ultimately responsible for ensuring service within a loose mesh of receiver-transmitters?

Question 8.1: Should Ofcom do more to promote competition in mobile and wireless markets?:

No, not for purely domestic operators. There is a risk of hyper-competition emerging that would impact infrastructure investment and innovation.

For handsets though the aspect of bundling should be prevented in order to make the handset market more competitive.

Question 8.2: Ofcom's strategy in telecommunications is to promote competition at the deepest level of infrastructure that is effective and sustainable. How might this strategy be applied, given future developments in the mobile sector? Under what circumstances, if ever, would it make sense to consider access regulation for mobile platforms?:

NA

Question 8.3: What role can competition play in ensuring that future development of the mobile internet provides an open and flexible environment for a wide range of services? Should Ofcom explore open access requirements to ensure opportunities for innovation? What role might 'net neutrality? play in the mobile sector?:

Yes - as much openess and interoperability as feasible.

Question 8.4: What role might competition play in addressing questions about transparency of prices, services and contractual conditions offered to consumers of mobile and wireless services? What role should regulation play in addressing these questions?:

NA

Question 8.5: What is the best way to promote content standards and ensure privacy protection for increasingly complex content and transaction services? How will privacy issues fare in a world where services are more personal and more complex?:

NA

Question 8.6: Will the mobile termination rate regime need to evolve or change more fundamentally? What is the best approach to adopt?:

NA

Question 8.7: If competition does not reduce international roaming charges sufficiently, how should regulators respond, if at all?:

Cross-border operators e.g. Vodafone, should be capped at charging either the local or home price (at discretion of operator). International M&As should not just be about capturing more customers but also about integrator back-room activities e.g. network synergy. With a single international network, there is no excuse for charging roaming rates.

Question 8.8: How might universal service and universal access need to adapt in a world where we increasingly rely on mobile services? What role might mobile play in universal access delivery in future?:

NA

Question 8.9: Can markets and commercial agreements address issues such as ?not spots? and emergency access?If not, what role might be played by a regulator to address these issues?:

NA

Question 8.10: How might access for particular groups (such as the elderly and disabled users) need to evolve in future? What role can competition play in addressing these questions?:

NA

Question 8.11: Do you have any comments regarding our proposed way forward and the objectives of the next phase of this Assessment?:

NA

Additional comments:

Avoiding punitive pricing of pas-as-you-go customers. This is unique in the sense that payment is made in advance of service. This may be partly ofset by the lack of predictable revenue for the operator. It does however cost more to operate. Ideally credit purchased should be discounted at the operator's internal cost of capital (or Bank of England base interest rate at a minimum). This may disincentivise usage in the short-term but combined with the ability to transfer credit between users (and ideally networks) would open up the possibility of "service trading" in the future i.e. the trading of "seconds of service". This would create a further market of competition for current operators.