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By email to mobile@ofcom.org.uk

Dear Emma

Mobile citizens, mobile consumers

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

1. Scope of this response

We would like to comment on the potential introduction of national roaming and the scope for this to address coverage not-spots, and to minimise the environmental impact of telecommunications infrastructure in remote rural areas such as National Parks.

2. Current position on roaming and network coverage

We understand that national roaming is not currently regulated in the UK, with the current exception of national roaming for 3 (the 3G mobile operator) and as such there has not been a regulatory requirement upon the UK mobile network operators (MNOs) to offer national roaming services. This has meant that in practice MNOs have entered into very few national roaming agreements although some examples do exist. For example, a joint project by Vodafone and O2 (then BT Cellnet) supported by Highlands and Islands Enterprise and the European Union, led to increased mobile coverage in highland areas.

CNP notes that all the MNOs have fulfilled the minimum coverage obligations that they are required to deliver as part of their 3G licence obligations but that there are still areas of the UK, in particular remote rural areas, where there is either poor coverage or coverage by only a few operators (or only a single operator) and that this is particularly acute for 3G coverage (section 8.99 of the consultation document).

While there is considerable debate about geographic variations in availability and take up of communications services it is not surprising that in remote rural areas such as National Parks the gaps in network coverage are the largest, and that these are becoming increasingly less economic to fill. Given the high environmental quality of such areas, it is important that MNOs focus on closing such gaps in coverage in the most environmentally sensitive way. In National Parks this will necessitate landscape-friendly solutions as required by PPG8.

3. Ofcom and duty to have regard to National Park purposes

Ofcom has a statutory duty¹ to have regard to National Park purposes when coming to decisions or carrying out its activities relating to or affecting land within the National Parks. The government has clarified² that the duty is intended to ensure that the purposes for which National Parks have been designated are recognised as an essential consideration in reaching decisions or undertaking activities that would have an impact on the National Parks (Ofcom is listed on page 9 of this guidance as a body to which the duty applies).

This duty is relevant because National Park purposes include the conservation and enhancement of natural beauty and public enjoyment of the National Parks' special qualities such as open spaces and tranquillity. These can all be threatened by telecommunications development because of the size, design or proposed location of structures.

4. National roaming scheme

Section 8.100 of the consultation document asks whether national roaming might provide a mechanism to share costs to make the coverage of remote rural areas economically viable and reduce the number of not-spots within them.

Section 8.101 of the consultation document describes the related issue of 'emergency roaming' and the difficulties that UK consumers sometimes face in accessing the 999 services in remote areas, as compared with overseas users who can gain better access by roaming.

CNP supports the introduction of national roaming, either at a UK level or applied locally to discrete geographic units such as National Parks. In our view national roaming should be encouraged by Ofcom as it would have benefits across all of Ofcom's consumer interests:

- environmental benefits (by minimising the amount of network infrastructure needed, although we suggest a trial period to monitor the precise effects)
- economic benefits (by providing a more robust network at lower cost)
- social benefits (by improving coverage in remote rural areas)

CNP would also support emergency roaming to improve access for UK consumers to 999 services in remote rural areas.

Please do not hesitate to contact us should you need any further information.

Yours sincerely

Ruth Chambers

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¹ Section 11A of the 1949 National Parks and Access to the Countryside Act, as amended by Section 62 of the 1995 Environment Act

² Duties on relevant authorities to have regard to the purposes of National Parks, AONBs and the Norfolk and Suffolk Broads, Defra, 2005