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Scottish Government Response to Ofcom Consultation:

Mobile citizens, mobile consumers – Adapting regulation for a mobile, wireless world

The Scottish Government welcomes the opportunity to respond on Ofcom's consultation on an assessment of the mobile sector.

In general, we are broadly supportive of the approach proposed by Ofcom as set out in the consultation document. Whilst we do not have detailed views on the regulatory stance, we are generally supportive of regulations which encourage cooperation between operators for the benefit of consumers especially in rural locations.

As previously responded during the Digital Dividend Review Consultation, we are supportive of the wider spectrum strategy elements. In particular, it would be useful to see available spectrum used to promote innovative technology in the mobile market.

In respect of the full detailed consultation questions as set out in the consultation document, we have not provided a response to all, however we wish to offer some high level observations on a number of aspects of the consultation which are important to us, as follows below:

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

The impact on the economy of areas that are currently not covered by any mobile provider is of particular importance to the Scottish Government and something that needs to be considered on a UK-wide basis. Struggling businesses will be disadvantaged during a trying financial time for all organisations. Tourist tradespeople are impaired by being unable to advertise their venues as being "connected" to a mobile network and in a time when teleworking is being widely promoted, this is less of an option for occupants in these places.

Question 5.4: Have you been affected by issues about coverage of “not spots”? How has it affected you?

The Scottish Government has received many complaints about inadequate mobile coverage. They range from social equity issues to economic disadvantages. Where many areas are now able to receive phone services, there is still a wide dearth of 3G services. Occupants in these areas are unable to utilise the latest technology to compete on a level playing field with others.

We would be keen to see Ofcom take more action in the implementation of measures which would improve mobile coverage in rural areas in Scotland, for both 2G and 3G services. We understand much work has already been done to improve coverage for use of emergency services, for which we are supportive, however we'd be keen to see the scope widened and improved mobile coverage in Scotland per se. We would be interested in any work Ofcom may undertake to this end and would be interested to participate in discussions as appropriate.

I will be attending a meeting with representatives of Ofcom later this month, to discuss this consultation in more detail and it is hoped that more feedback will be able to be provided at that stage.

I hope this information is useful.

Yours sincerely

Jo Gwilym
Telecoms Policy Team