Title:

Mr

Forename:

John

Surname:

Thomson

Representing:

Organisation

Organisation (if applicable):

Scottish Natural Heritage

What do you want Ofcom to keep confidential?:

Keep nothing 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?:

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

SNH recognises the benefits that mobile telecommunications has brought to UK society. The infrastructure required to provide the services now considered an essential part of a modern society however does have environmental impacts. From a

natural heritage perspective SNH?s concerns lie primarily with the impact of existing and new tower sites, where they are located and what natural heritage features are affected. In particular the landscape and visual impact these sites may have both on the character and enjoyment of a particular landscape. This has the potential to affect not only those who live in the area impacted but all who visit and appreciate the area as a whole. There is further advice on the siting and design of masts within the following guidance;

? SNH Commissioned Report No. F00AA514 Telecommunications -Future Developments And The Potential Implications Or The Natural Heritage, 2001

? SNH Commissioned Report No. F00AA508 Siting and Design Guidelines for Mobile telecommunications Developments in the Highlands and Islands, 2000/02

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

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

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?:

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

SNH considers that alongside measures of service level and coverage, some measure of the environmental impact of the infrastructure required to provide the mobile services is required.

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?:

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

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

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?:

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

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

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?:

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

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

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?:

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

SNH recognises that the mobile and wireless market is competitive, but network operators should be taking more effort to explore mast or site sharing options in order to reduce landscape and visual impacts on the areas surrounding the masts. In addition to mast sharing the replacement of existing poor quality masts with better-designed ones would result in fewer problems from a landscape and visual standpoint. The aim should always be the most sensitive design that will do the job technically and in some especially sensitive sites some reduction in technical capacity make well be justified. We would encourage Ofcom to explore how it can ensure the necessary competition in the industry, whilst minimising the environmental impacts of the infrastructure required, through stronger encouragement of infrastructure sharing.

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?:

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?:

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?:

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?:

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

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

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?:

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?:

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?:

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

From a natural heritage perspective the first two scenarios within the report are likely to have minimal impact on landscape and recreation based on the reduced need for further tower sites to be obtained. Scenarios three and four however are predicted to result in a higher demand for tower sites which will put increasing pressure on both urban and rural landscapes, highlighting careful planning and design, and the importance of minimising the required infrastructure through more effort on sharing.

Additional comments: