

To: Joe Sonke

3rd Floor,

Ofcom, Riverside House,

2A Southwark Bridge Road,

London SE1 9HA.

August 24, 2007

Regarding: Consultation on the UK Broadband application for licence variation

Dear Mr. Sonke,

It is a pleasure to respond to your consultation on the UK Broadband application for license variation.

Navini Networks has direct experience with broadband wireless systems and our deployment in about seventy five commercial markets in fifty countries in the 2.5 and 3.5 GHz frequency bands. Navini is a pioneer of applying advanced technologies such as Beamforming and Multiple Input Multiple Output (MIMO) in WiMAX. When used with Beamforming and MIMO technologies, the system efficiency and capacity is further increased and makes broadband services feasible and economical in dense urban areas as well as sparsely populated regions. Beamforming with phased array antennas and MIMO technologies increases the range, system capacity and performance of a WiMAX cell. In this spirit we are writing to you in support of the request by UK Broadband.

In response to the first question asked, we unequivocally support the application neutrality request by UK Boadband's. Delivery of mobile broadband services at 3.5GHz will lead to competition (mobile broadband services) to incumbent 3G operators as well as potential new entrants at 2.5GHz. The clear economic benefits are extended to the end consumer by service, competition and choice. Developments around the world at 3.5GHz have demonstrated that 3.5GHz is becoming the mobile WiMAX spectrum of choice

across Europe ahead of 2.5GHz. As a reference, the Italian auction has kicked off and it appears that this spectrum is going to be service neutral to include mobile usage. We are aware that Ofcom has submitted input to the WRC that 3.4-3.8GHz is identified as a mobile spectrum band because the ITU's analysis reveals that there is an impending scarcity of mobile spectrum. Lastly, the WiMAX Forum has identified this 3.5GHz spectrum as part of the WiMAX Forum Mobile System Profile based in IEEE802.16e-2005. Mobile WiMAX brings innovative technologies to make better use of spectrum resources such as MIMO and Beamforming.

Please see the attached consultation cover sheet and text of our response.

Sincerely,

David Maez

Director of Product Strategy and Standards

Navini Networks

Richardson, Texas, USA