

Question 1: Do you agree with these proposals for the awards of the three bands or have any other comments on the contents of this document?

Intellect supports Ofcom's intention to release unused spectrum to the market at the earliest opportunity.

Question 2: Do you agree with the analysis in section 5 or have any comments on adjacent interference issues?

Intellect highlights the need to make all technical information on adjacent services available.

Question 3: Do you agree that Ofcom should authorise use of the spectrum bands 2500-2690 MHz, 2010-2025 MHz and 2290-2300 MHz?

Yes. Intellect fully supports Ofcom's objectives to promote -

- a) the efficient management and use of the spectrum;
- b) the economic and other benefits that may arise from use of the spectrum;
- c) the development of innovative services; and
- d) competition in the provision of electronic communications services.

Question 4: Do you agree that awarding licences by auction would be the appropriate mechanism for authorising use of the spectrum bands 2500-2690 MHz, 2010-2025 MHz and 2290-2300 MHz?

Yes.

Question 5: Do you agree that it is likely to be in the interests of citizens and consumers to proceed with the award of the 2.6 GHz and 2010 MHz bands as soon as practicable, rather than to delay the award pending reduction in uncertainty relating to other bands?

Yes.

Question 6: Do you agree Ofcom should aim to award the bands 2500-2690 MHz, 2010-2025 MHz and 2290-2300 MHz by the end of 2007, while keeping the position on the 2.6 GHz and 2010 MHz bands under review in the light of possible developments in European regulatory fora?

Intellect agrees that Ofcom should release the bands 2500-2690 MHz, 2010-2025 MHz and 2290-2300 MHz by the end of 2007 and we support Ofcom continuing to work constructively within Europe to ensure that the awards can proceed smoothly.

Question 7: Do you agree with Ofcom's proposals for licence conditions (technology neutrality, tradability, conditions of tenure and absence of roll-out obligations)?

Intellect believes this is reasonable. We further believe that spectrum trading may mitigate against the risk of spectrum hoarding.

Question 8: Do you have views on whether or not there should be a "safeguard" cap on the amount of spectrum that any one bidder could win in an award for the 2.6 GHz bands and, if so, do you have a view on whether 90 MHz would be an appropriate size for a safeguard cap?

No comment.

Question 9: Do you agree with Ofcom's proposal to package spectrum as lots of 2 x 5 MHz for paired use and 5 MHz lots for unpaired spectrum and to allow the aggregation of lots by bidders?

Yes.

Question 10: Do you agree with Ofcom's proposed approach to allowing the respective amounts of paired to unpaired spectrum for the band 2500-2690 MHz to be varied (maintaining the 120 MHz duplex spacing and allowing additional unpaired spectrum, if needed, at the top end of the band)?

No comment.

Question 11: Do you agree with Ofcom's proposals for a 5 MHz restricted block between FDD and TDD neighbours and between TDD and TDD neighbours and with a modified out-of-band base station mask for second adjacent 5 MHz blocks?

Intellect believes this is reasonable.

Question 12: Do you agree with Ofcom's proposals to award the 2010 MHz band as a single 15 MHz lot?

Intellect agrees with the proposal to release the 2010 MHz band as a single 15 MHz lot while retaining flexibility on how it can be used.

Question 13: Do you agree with Ofcom's proposals to award the 2290 MHz band as a single 10 MHz lot?

Intellect agrees with the proposal to release the 2290 MHz band as a single 10 MHz lot while retaining flexibility on how it can be used.

Question 14: Do you agree with Ofcom's proposals to combine the award of the 2.6 GHz and 2010 MHz bands and to hold the award of the 2290 MHz band separately and in advance?

Intellect agrees the 2.6 GHz and 2010 MHz bands should be awarded at the same time but the date of the award of 2290 MHz is less critical and should not impact the timing of 2.6 GHz / 2010 MHz awards. We see release of 2.6 GHz and 2010 MHz as a priority during 2007.

Question 15: Do you agree with Ofcom's proposals for a two-stage auction design for the 2.6 GHz and 2010 MHz bands?

Intellect agrees with Stage 1 of the two stage auction process as a "price discovery" stage but has no further comment on any other aspect of the process.

Question 16: Do you agree with Ofcom proposals to award the 2290 MHz band through a second price sealed bid auction?

No comment.

Question 17: Do you have a preference for either of the two approaches to specifying technical licence conditions?

Intellect prefers the mask approach. Whilst we understand the new approach that Ofcom is trying to encourage we think that the SUR approach still requires a lot of work to validate.

Question 18: Do you have any comments on the transmitter spectrum masks defined below?

Due to the complexity of the spectrum masks process Intellect Members are still reviewing it and are likely to respond directly. Intellect supports Ofcom's endeavours to find a balanced technical solution.

Question 19: Do you have any comments on the SUR parameters defined below?

Intellect believes that there are still technical issues that need to be resolved and Intellect Members are likely to respond directly to Ofcom.

Question 20: Do you have any comments on the SUR methodology and assumptions detailed in this annex?

As above for Q19.

Question 21: Do you have any comments on the use of the Visualyse tool as described, on the assumptions or the propagation model proposed in this annex?

No comment.

Question 22: Do you have any comments on the assumptions detailed in this annex?

No comment.

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