

Executive Summary

T-Mobile welcomes the opportunity to comment on Ofcom's proposals regarding the measurement of 3G coverage for the purpose of compliance with its 3G licence.

As Ofcom will be aware, T-Mobile believes that the application of the coverage obligation is discriminatory when compared with other spectrum licences awarded by Ofcom.

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Practical issues regarding measuring coverage

Without prejudice to the above issues, T-Mobile provides in the response comments regarding the issues of measurement of 3G coverage. T-Mobile agrees with the principles of the methodology proposed for measurement however, T-Mobile has some comments regarding the details of the proposals. In particular T-Mobile believes that at the very least operators need the opportunity to provide Ofcom with a sample of data so that operators can compare the results from their own planning tools with those from Ofcom's.

T-Mobile also requests that operators are permitted to submit a complete dataset for a trial assessment at any point from Q1 2007 on a confidential basis and that Ofcom will promptly provide the operator with the coverage percentage from that trial database.

Introduction

As Ofcom will be aware, T-Mobile believes that the application of the coverage obligation is discriminatory when compared with other spectrum licences awarded by Ofcom.

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Without prejudice to the above issues, we provide below comments on the questions set out in the consultation document.

Question 1)

Do you have any comment on Ofcom's proposed basic methodology?

T-Mobile agrees with the use of ITU-R P.1546-2, with the propagation curve for 50% locations, 50% time as the basis for assessing coverage.

T-Mobile agrees that extensive field strength measurements would be costly and time consuming. In addition a process would need to be agreed for calibration / comparison between measured data and calculated data. This would not be appropriate for this purpose.

With respect to the data that Ofcom has requested in A6.1, T-Mobile has two comments:

- Firstly, T-Mobile would provide the information on a confidential basis purely for the purpose of assessing compliance with the coverage obligation. T-Mobile would provide the data on the basis that it was not used for any other purposes.
- Secondly, Ofcom has requested in A6.1 that postcode data is provided in addition to Eastings and Northings. Ofcom will be aware that Eastings and Northings are far more accurate and that postcodes are not always available or may relate to the nearest building rather than the piece of land on which the cell site is situation. T-Mobile would therefore request that postcodes are removed from the dataset requirements.

Engineering analysis in a cellular planning tool is very much dependant on the implementation of data sets and prediction algorithms. It is unlikely that analysis of coverage results in either of the tools in use by the MNOs and Ofcom will yield very closely correlated results.

Therefore operators need the opportunity to provide Ofcom with a sample of representative data so that operators can compare the results from their planning tool with those from Ofcom's. This needs to be done as soon as possible following the end of this consultation process. A high degree of correlation will need to be achieved, to ensure that operators have confidence in the completed evaluation.

T-Mobile also requests that operators are permitted to submit a complete dataset for a trial assessment at any point from Q1 2007 on a confidential basis and that Ofcom will promptly provide the operator with the coverage percentage from that trial dataset.

In the data assumptions table A6.2, T-Mobile assumes that the default antenna down tilt is 2 degrees, rather than the 2 dB set out in the table.

Question 2)

Do you agree that this is an appropriate basis for measurement?

T-Mobile agrees with a received signal level analysis based on the CPICH transmitted power. Based on T-Mobile's network 10% would be the appropriate figure to use for the CPICH %.

Question 3)

Do you have any comment on this assessment criterion?

T-Mobile agrees that a Primary CPICH signal level of -110 dBm at the cell edge is acceptable for the purposes of assessing coverage. This criterion should be established outdoors for 80% of the population.

Question 4)

Do you have any comment on Ofcom's proposals in relation to population data?

T-Mobile agrees with Ofcom's proposals in relation to population data including the use of 2001 census data for the analysis.

T-Mobile (UK)

19th October 2006