

Martin Fenton

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Eich cyf . Your ref
Ein cyf . Our ref

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Dear Mr Fenton

Ofcom consultation on 3G rollout obligations

I am providing the Welsh Assembly Government's response to this Ofcom consultation.

We largely agree with Ofcom's approach and make these comments in relation to the consultation questions:

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

The methodology appears sound but the question still remains in respect of what 80% of the UK actually means to Wales i.e. how much of the 80% coverage is physically in Wales. The geography of Wales means that there are large areas, which are rural and sparsely populated, and the areas, which are more densely populated and thus commercially attractive to operators, are in the south-east and north-west. Using 80% of UK population means that the original licence conditions provided for very little obligation to rollout in Wales.

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

We agree with Ofcom's proposal to use a single value for the Primary common pilot channel (CPICH) power in the range 5-10% in its analysis.

3) Do you have any comment on the assessment criterion?

We agree with Ofcom's proposal that primary CHICH signal level of – 110dBm is assumed for the purposes of assessing coverage.

4) Do you have any comment on relation to population data?

Although we acknowledge that the obligation refers to 'where people live' this does not reflect accurately how people use mobile phones. This is particularly important when gauging the coverage in rural areas of Wales. We ask Ofcom to consider revising the obligation to encourage greater rollout in these areas.

Yours sincerely

Christine Cook
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Telecoms Policy