

## **Intellect response to Ofcom discussion on the award of available spectrum in the 2.6 GHz and 2010MHz bands**

**Closing date for responses 28<sup>th</sup> September, 2007**

Intellect is the UK largest trade association for the IT, telecoms and electronics industries. Its members account for over 80% of these markets and include blue-chip multinationals as well as early stage technology companies. These industries together generate around 10% of UK GDP and 15% of UK trade. Uniquely among UK industry associations, we offer the views of experts in a wide range of wireless technologies. For more information go to [www.intellectuk.org](http://www.intellectuk.org)

Intellect welcomes this opportunity to contribute to the discussion on the award of spectrum in the 2.6GHz band and to reply to the specific question set out in the consultation document. We have chosen not to comment on the 2010MHz band.

Before dealing with the questions identified by Ofcom we would like to confirm that there is broad support within Intellect for awards in this band to take place as soon as reasonably practical and our comments reflect this view. This is because our members consider the timeliness of awards to be critical to reducing market entry barriers and otherwise increasing competition.

### ***Question 1: Do stakeholders agree with Ofcom's assessment of the blocking effect and of its implications for spectrum packaging?***

Our members are unable to reach a consensus on the validity of the Ofcom study into the theoretical blocking effect of TDD end user devices on stationary FDD handsets and its implication for spectrum packaging . However members agree that bidders should not rely on this evidence alone when developing their business plans on the evidence of the assessment alone.

There is consensus among our members that bidders' need for more information is not a reason to delay the release of spectrum.

### ***Question 2: Do stakeholders agree with Ofcom's analysis of interference conditions that are relevant to the use of generic lots?***

Our members have differing views on the scale of interference likely in different blocks, and thus on the impact on the use of generic lots within the auction design. That said, although we are not auction design experts, we do believe these differences in value between lots are accommodated within the current auction design..

### ***Question 3: Do stakeholders agree with Ofcom's updated proposals for technical conditions or have views on the possibility of:***

- ***extending out-of-block masks out to an offset of +20MHz from assigned blocks;***
- ***placing additional restrictions on the use of restricted blocks between the FDD uplink and TDD; or***
- ***a reduction in mobile station in-band power to 18dBm/MHz EIRP?***



Intellect notes the need to maximise the utility of the awarded spectrum and the restricted channels should only be constrained to the degree necessary to avoid significant interference problems.

However, Intellect notes that the in-band power limits of mobiles and base stations should be defined in the most technology neutral way and therefore a power limit per given bandwidth may be preferable to a power density.

***Question 4: Do stakeholders agree with the proposed changes to the auction design set out in the December 2006 consultation?***

Whilst we are not experts in auction design, Intellect supports the changes Ofcom has proposed to the auction process in the August document.

**Other comments on the issues raised in the document: Hoarding and Spectrum Caps.**

We agree that the hoarding of spectrum could be a serious issue that Ofcom should attempt to address. We also agree that an appropriate cap is sensible.

-----End of response-----