

SPECTRUM FRAMEWORK REVIEW RESPONSE

OFCOM ADVISORY COMMITTEE FOR NORTHERN IRELAND

The committee would firstly like to welcome the work Ofcom is undertaking in the spectrum area. We support the need for changes in order to promote the best use of the scarce resource that is spectrum and enable a competitive market place in the arena of spectrum trading and pricing. Detailed below are the areas where we have concern or request that Ofcom carries out further work as a part of the ongoing Spectrum review process:

- We believe that due to the size of the market within NI there is a very real probability that the market could stagnate due to speculators buying up available spectrum. To combat this we would like to see the addition of a 'use it or lose it' clause in the spectrum trading regulation. In addition we would also welcome an ongoing program of consumer testing to ensure that the spectrum allocations are providing key benefits to the consumers of each region.
- As we are the only region of the UK with a land border to another EU country we are in a unique position to further promote cross-border business opportunities. We believe this can be achieved by the introduction where possible of 'All Ireland' licensing of available spectrum. We understand that Ofcom is conducting trials in this area; the committee would like to welcome this as another example of the beneficial collaborative work between Ofcom and ComReg.
- We would request that there is consistency of use of the 1790-1798MHz spectrum in its use for Emergency services. We believe that there are instances with air/sea rescue that could benefit from integration.
- Although we recognise the desire for a market driven spectrum trading arena we would welcome the prioritisation of some citizen specific applications that could support the ICT/media literacy agenda as part of Ofcom's annual plan. This should encourage innovation and value added services to the consumer in addition to cost and accessibility benefits.
- We would welcome further research and development into the possibility of using higher power in licence exempt bands for rural areas in NI.