



**Internet Services Providers'
Association**
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ISPA welcomes the chance to respond to Ofcom's Spectrum Framework Review. ISPA is concerned with the lack of consideration in the Spectrum Framework Review of Internet Service Providers who use radio spectrum as a means to provide Internet access to consumers in the UK.

ISPA believes that in the light of the proposals made in the Strategic Telecoms Review, particularly the emphasis of the importance of the promotion of competition, it is essential to ensure that ISPs are able to compete on a level footing in this market, and have the opportunity to pursue alternative choices to the structures currently offered by BT.

ISPA believes that there is a need to establish a range of radio frequencies for ISPs to offer broadband services. Further, ISPA is of the opinion that if dedicated frequencies were offered, and specific frequencies were reserved for broadband Internet access, problems of interference could be minimised. ISPA believes that the current narrow spectrum on offer, combined with military use of the spectrum and mobile phone use, is further evidence of the need for a dedicated spectrum of agreed universal frequencies.

In terms of consumer benefit, ISPA believes that in areas where the local loop hasn't been unbundled, particularly in rural areas, wireless access via radio spectrum will be key to Internet connection. While BT estimate that by June 2005, 99.6% of UK homes and businesses will be capable of being connected to a broadband enabled exchange, this leaves 0.4% of the population who are not predicted to have access, or a potentially much larger percentage who have limited bandwidth (i.e. 512k on +6km links), and who would be well served by wireless access over radio spectrum.