

**Your Communications**

Hathersage Road  
Manchester, M13 0EH

Phone: 0800 195 9000

Fax: 0800 195 9001

Web: [www.yourcommunications.co.uk](http://www.yourcommunications.co.uk)

Laurence Green  
11B/20C  
Radiocommunications Agency  
Wyndham House  
189 Marsh Wall London  
E14 9SX

14 May, 2002

Dear Mr Green, I would like to comment on the Cave Report regarding restrictions currently in place for 28GHz BFWA Licence Holders. Your Communications successfully bid at auction and secured four regional licences in November 2000.

I agree that restrictions regarding services that can be offered by licence holders should be relaxed to allow an operator to offer any service that can be supported by their chosen BFWA solution. The RA has been technology agnostic so why not service agnostic? If the current restriction on cellular backhaul is removed I feel that this may provide a kick-start to the deployment of BFWA as this traffic could subsidise roll out to areas of the country that are not currently economically viable. Rolling out any network is costly and time consuming and anything that restricts the potential target audience will stifle an already difficult business proposition. This one action may create major interest in the unsold licences, which seem to be generating little interest.

Use it or lose it clauses should not be abandoned completely but should be viewed in light of current telecom market conditions which make large capital investments harder to justify when potential revenues are unsure. If the operator has clearly entered into the spirit of meeting the requirement and continues to roll out service then this should satisfy the requirement.

Any concessions that are made to future BFWA licence holders should also be made retrospectively to existing holders i.e. any reductions in reserve prices to attract new licensees.

If you would like to discuss anything contained within this letter any further please do not hesitate to give me a call.

Yours sincerely

Peter Vogan

Radio Planning Manager

[peter.vogan@yourcommunications.co.uk](mailto:peter.vogan@yourcommunications.co.uk)

0161 609 7099 / 07733 018150