

Dear Geoff,

We broadly support the Intellect response to this consultation, and would like to concentrate on just two issues here.

1. As manufacturers we are interested in the long-term viability of the spectrum use. Only with a degree of stability (and some economies of scale) will the necessary investments take place. To that extent the assumption made in the document that trading spectrum will 'place it in the hands of those who will use it best' does also depend on manufacturers building networks and terminals for the new standards that might be envisaged, in quantities that are economical, and in timeframes in line with the licences. We feel this has been overlooked by the economic theorists, and would urge caution in the deregulation of the spectrum that has been proposed.

Therefore we do not in principle support the proposal to permit change of configuration and/or use in the sectors listed in question 5.

2. We believe the methodology used in the RIA is flawed. It appears to quantify the value of the traded spectrum, rather than change in benefits as a result of trading (with v without.)

Yours sincerely

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