

Kent County Council Submission

Enabling opportunities for innovation: shared access to spectrum supporting mobile technology

Kent County Council has a long-standing interest in improving the County's digital connectivity. We are supportive of the objectives of this consultation to enable shared access to spectrum where this could support:

- the implementation of new business applications of Internet of Things (IOT) technologies by enabling the development of private networks offering low latency and high reliability connectivity;
- rural broadband connectivity improvements by adding to the existing spectrum options for fixed wireless access, especially in areas that are not served by adequate fixed broadband infrastructure; and
- better mobile coverage in urban and rural not-spots (indoors and outdoors) by enabling third parties to acquire spectrum in specific locations.

Based on our experience of facilitating and developing community-led schemes and innovation to improve local connectivity in hard to reach areas, we would like to comment on the following aspects of this consultation:

Question 1 (section 3): Do you agree with our proposal for a single authorisation approach for new users to access the three shared access bands and that this will be coordinated by Ofcom and authorised through individual licensing on a per location, first come, first served basis?

Yes – we are supportive of the proposed single authorisation approach for new users to access the three shared access bands. Given the potential future demand for IOT applications and the importance of enabling further connectivity improvements in hard-to-serve areas, we believe that Ofcom must take on the role of managing and co-ordinating access to this spectrum. We agree with Ofcom's conclusions that the existing concurrent access approach is unlikely to be practical when the number of users in the band increases and that a self-coordinating approach could lead to interference issues.

Whilst we understand the rationale for a first come, first served approach, given that improving rural connectivity is both a national and local priority, we would ask that Ofcom prioritises these use cases when assessing applications for public access.

Question 5: Do you agree with our proposal for the low and medium power licence?

Yes – we agree with the proposal for low and medium power licences. We also support that medium power licence applications should be limited to rural areas to enable fixed wireless broadband access and community-led mobile schemes.

Question 18 (Section 8): Do you agree with our proposal for the Local Access licence?

Yes – we agree with the proposed local licensing process and share Ofcom’s view, given the importance of some of the identified use cases for spectrum sharing, that creating a new process to award local licences is preferable to a spectrum leasing approach. We agree that leasing has many drawbacks and that there may be little incentive for existing licensees to engage with third parties and take on the additional responsibilities that would be associated with this.

Question 20 (Section 8): What information should Ofcom consider providing for potential applicants in the future and why would this be of use?

We would like to see Ofcom establish a database, similar to white spaces, covering the locations and the frequencies that are being used. This will allow gaps to be identified where a frequency is not being used in a particular location. We believe that this would support applications for local licences and encourage more innovative use of the spectrum available.

Question 21 (Section 8): Do you agree with our proposal to have a defined licence period and do you have any comments on the proposed licence term of three years?

We would ask that the licence term is extended to at least five years for community-led schemes that are designed to improve mobile and broadband access. This is because local and national funders may be reluctant to support and invest in the associated infrastructure where there appears to be a relatively short time-limited benefit. Similarly, a three-year timeframe is likely to limit local buy-in and support for community-led schemes.

Question 23 (Section 8): Do you agree with our fee proposal for the new local access licence?

Whilst we agree with the overall approach towards fees, we would ask that Ofcom differentiate between commercial applications and community-led ventures which are designed to improve connectivity in areas of market failure. Given the economics of, and the challenges involved in funding community-led schemes, we believe that Ofcom should either waive or offer substantially reduced rates for local community-led schemes which improve connectivity in not-spot areas.