

Comments:

Question 1: Anyone with an interest in these matters is invited to comment on any aspect of our proposals, conclusions and supporting analysis. We would also welcome any evidence that interested parties are able to provide in support of their comments.:

Intellect has noted the very comprehensive analyses that Ofcom has provided to support its proposals but has not been in a position to analyse these in detail. Intellect does not take a particular position on which of the options that Ofcom has outlined is preferable, nor on the amount of spectrum that should be released and re-auctioned in a technology neutral manner if that option is decided upon. We do however note that Ofcom's analysis seems to be based on consideration of the sustainable competitive provision of mobile broadband in the UK considering only the existing five mobile operators and existing network topologies. We note that trends to share infrastructure and the introduction of new technologies, such as femtocells backhauled with fixed broadband, as well as the possibility that other operators or MVNOs may contribute to the competitive provision of mobile broadband, are all factors that Ofcom may need to take into account when deciding the complete regulatory solution for the re-farmed 2G mobile spectrum.