

Title:

Mr

Forename:

Guy

Surname:

Kenyon

Representing:

Organisation

Organisation (if applicable):

Kenyon Consulting

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Question 1: Do you agree that meeting the future growth in demand for mobile broadband capacity will deliver significant benefits to citizens and consumers?:

Question 2: Do you agree that additional harmonised mobile broadband spectrum will play an important role in meeting the future growth in demand for mobile broadband capacity? What are your views on the overall quantity of harmonised spectrum that will be required to meet future demand? How does this compare with the expected increase in spectrum for mobile use discussed in this section?:

Question 3: Do you agree that additional harmonised spectrum provided by the 700 MHz band could play an important role in meeting the future growth in mobile broadband capacity? :

Question 4: Do you agree that the value of the role played by the 700 MHz band in meeting the future growth in mobile broadband capacity would be greater if it becomes available before other capacity enhancing techniques have been exhausted at existing mobile sites?:

Question 5: What timing of 700MHz release would maximise the benefits associated with its use for mobile broadband?:

Question 6: Do you agree that DTT will continue to play an important role in providing universal low cost access to PSB content over at least the next decade?:

Question 7: Do you agree that, absent major changes in available spectrum, DTT would continue to remain attractive to viewers and deliver important benefits to citizens and consumers over at least the next decade?:

Question 8: What are your views on the future technical evolution of the DTT platform? Are there other relevant factors affecting future DTT spectrum requirements that we should consider as we develop an approach to secure benefits from UHF band IV and V over the long term?:

Question 9: Do you agree that a longer term approach to secure benefits from UHF band IV and V should consider how to safeguard benefits delivered by the DTT platform?:

Question 10: Are there other material factors affecting the future requirements of PMSE that we should consider as we develop an approach to secure long term benefits from UHF band IV and V?:

Question 11: Are there other material factors affecting the future requirements of Local TV that we should consider as we develop an approach to secure long term benefits from UHF band IV and V?:

Question 12: Are there other material factors affecting the future requirements of WSD applications that we should consider as we develop an approach to secure long term benefits from UHF band IV and V?:

No material factors other than Ofcom should forge ahead as rapidly as possible to enable White Space Devices (WSDs) across the UHF bands IV and V in order for the UK to gain benefits arising from such usage and a world leading market position in WSDs.

Question 13: Aside from WSDs, are there other innovative ways in which to use UHF bands IV and V to deliver services and, therefore, material benefits to users:

Question 14: Are there other material factors affecting the future requirements of emergency services applications that we should be aware of as we develop an approach to secure long term benefits from UHF band IV and V?:

It is particularly unfortunate that Ofcom/UK alone decided to clear the 600MHz band following DSO following earlier decisions. This was always likely to lead to a tiny market that other countries would not support and which manufacturers of comms equipment would shun. The, now widely accepted, proposal to clear the 700MHz band and revert to the use of the 600MHz band for DTT is sound. The alignment of 700MHz bands across the world for mobile communications will support a much larger market which regulators, users and suppliers can address with the benefits of scale.

It is particularly appropriate to try to align emergency services communications to this band to try to achieve a market of scale for the specialist communications services (PTT, Group call, Emergency Call) that these users require.

Question 15: Do you agree that the approach that is most likely to secure significant benefits from UHF band IV and V over the long term is one that enables the release of the 700 MHz band for mobile broadband whilst also ensuring the role of the DTT platform is safeguarded?:

Question 16: Do you believe there is a material risk that the DTT platform will have insufficient spectrum to continue to deliver important benefits (including providing universal low cost access to PSB content) if the 600MHz band is not used for DTT after change of use of the 700 MHz band? :

Question 17: Do you believe that using the 600 MHz band for DTT after clearing the 700 MHz band would reduce the risk that DTT platform will not be able to continue to provide important citizen and consumer benefits? :

Question 18: Do you agree that the future benefits for citizens and consumers of enabling the release of the 700 MHz band whilst maintaining the role of DTT are likely to outweigh the loss in benefits of the 600 MHz band not being able to be used for other services in the long term?:

Question 19: Have we identified correctly the possible short-term uses of the 600 MHz spectrum? Are there other short-term uses we should consider?:

I agree that one of the key uses of this band is for WSD access on an unlicensed basis. There are other approaches that may provide greater certainty of access to the spectrum for particular applications such as emergency service/ public protection and disaster recovery communications. These include light-licensing, restricted licensing, priority access or other alternatives.

Question 20: Which option(s) for releasing 600 MHz in the short term would maximise its value whilst supporting our proposed longer term objectives?:

Option (a) is my preference - specifically use of the band for WSD access. This could readily be delivered by the database access method proposed for the rest of the UHF TV band. When TV transmitters are moved from the 700MHz band to the 600MHz band then the database would be updated and WSDs would avoid the licensed use.

Any spectrum that is vacant awaiting award or allocation could and should be treated in the same manner.

Question 21: Do you agree that the wider impacts of a future clearance of the 700MHz band could be managed to prevent them having a detrimental impact on consumers and the services operating in this band?:

Question 22: Do you agree that the approach set out in this consultation is likely to secure significant benefits for citizens and consumers over the long term?:

Question 23: Have we correctly identified the main areas of future work that could follow this consultation process subject to its outcome? :

Additional comments:

I consider it particularly timely for Ofcom to reconsider the UK only proposal to clear the 600MHz band following DSO which was going to lead to a sub scale solution. The approach of using this band for DTT as other countries have chosen to do and to free up the 700MHz band for mobile communications will lead to strong support for suppliers to apply novel technologies to this band to the benefit of emergency services/ public protection and disaster recovery communications worldwide.