



Andrew Chong, Esq.  
Spectrum Policy Group  
OFCOM

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Dear Mr Chong,

### **UHF and VHF Spectrum Planning – Ofcom Call for Inputs**

This response to Ofcom's consultation of 26 July 2013 on UHF and VHF spectrum planning is being sent by the Channel Islands Competition and Regulatory Authorities (CICRA). CICRA is the economic regulator in the Channel Islands for the telecommunication sector and we recommend to Ofcom how it should allocate spectrum for telecommunication purposes in the Channel Islands.

This response supports and endorses the joint response which the States of Jersey and Guernsey are sending Ofcom.

Like the States of Jersey and Guernsey, we wish to emphasise the necessity that the planning tools and models Ofcom is proposing to develop should be designed also to meet the needs of the Channel Islands and be available to stakeholders interested in the development of spectrum use in these Islands.

As Ofcom notes in paragraph 2.9 of its consultation: "The ability to model DTT coverage and to carry out assessments of the impact of new-entrant technologies such as 4G and white space devices will be key to ensuring that these new technologies are able to realise their maximum potential (...)". The Channel Islands should not be disadvantaged in developing the use of these new technologies by a lack of planning tools.

We also note, in paragraph 2.15 of Ofcom's document, the important conclusion that: "Whatever form any new planning model takes, one important principle that is key is that the model can be made available to third parties, subject to appropriate terms and conditions." Our recent experience has been that Ofcom planning tools might have been available to us, but at a prohibitive cost only. As the telecommunication sector in the Channel Islands pays the licensing fees that should enable Ofcom to recover its costs, including those of developing new planning tools, we believe that planning tools developed by or for Ofcom – and their use – should be available to us at low cost, probably in line with what Ofcom's own departments would need to pay to obtain specific analyses from Ofcom's planning tools.

We shall be pleased to discuss our response with Ofcom and to provide additional information.

Yours sincerely,

**Andrew Riseley**

Chief Executive

Channel Islands Competition and Regulatory Authorities

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