



Consultation: Mobile Phone Repeaters - Proposed Changes to the Wireless Telegraphy Regulations 2022

Cellnex UK Response

December 2023

Overview of Cellnex UK

Cellnex Group

This response is submitted by Cellnex UK ([link](#)), part of Cellnex Group ([link](#)) which:

- Supports over 420 million mobile connections across Europe
- Operates >70,000 mobile sites today, which will grow to >130,000 by 2030
- Is Europe's leading neutral host mobile infrastructure provider, covering 12 countries: Austria, Denmark, France, Ireland, Italy, Netherlands, Poland, Portugal, Spain, Sweden, Switzerland and the UK
- Provides mobile infrastructure services, private and mission-critical networks, distributed antenna systems and small cells, and smart/IoT and innovative services
- Operates sixteen mission critical networks in Spain for emergency bodies to ensure public safety
- Has deployed forty private networks across Europe for enterprise applications
- Had an annual turnover of €3.5bn in 2022
- Is listed on the main sustainability indices, and evaluated by highly reputable international analysts such as CDP, Sustainalytics, FTSE4Good, MSCI and Standard Ethics

Where possible, we have sought to provide international examples from the wider Cellnex Group in our response.

Cellnex UK

We are the trusted partner of all the major UK mobile network operators, hundreds of private businesses, the emergency services, as well as the UK Government, specifically Cellnex UK:

- Is the UK's leading independent wireless connectivity infrastructure company
- Operates >9,000 mobile sites today, which will grow to >13,000 by 2031
- Has deployed over 1,000 small cells to date
- Is a provider of private networks in campus and indoor environments
- Is an indoor mobile coverage provider, most notably in the Etihad stadium in Manchester
- Is deploying contiguous mobile coverage and capacity along the 81km Brighton to London Mainline and three major stations
- Has won three DCMS 5G competitions, working collaboratively with universities and start-ups to deliver 5G innovation
- Employs around 300 people across four major UK locations – Reading, Manchester, Scotland and Leamington Spa
- Has invested £6.1bn in the UK since 2016

Basis of Response

We have reviewed and commented on this consultation on the basis of Cellnex UK as a leading provider of indoor cellular coverage and capacity solutions.

1. Do you agree with our proposal to remove the requirement for licence-exempt indoor mobile repeaters to carry a 2G and/or 3G signal? If not, please set out your reasons with any supporting evidence.

Cellnex UK is supportive of this change.

We note the following point regarding distributed antenna systems ('DAS') which are not repeaters but carry 'freshly generated' signal from base stations and/or small cells:

- DAS deployments should not have to provide 2G and/or 3G signal for the same rationale as outlined in the consultation for repeaters
- Ofcom should support mobile network operator ('MNO') activity underway to rewrite the Joint Operator Technical Standards ('JOTS') to remove this requirement for indoor coverage, noting the following from JOTS-NHIB-Specification-Annex-2-Radio-Requirements-V2-1:

"The NHP and/or Neutral Host shall ensure that the tenant, landlord and visitors to the building are made aware that the in-building radio solution is only 4G/5G capable. Thus, visitors to that building with devices which are either not VoLTE capable or not VoLTE enabled will not be able to make Circuit Switched Fall-Back (CSFB) emergency calls via the inbuilding system. Instead they will rely on the preexisting Operator coverage provided by external macrocells or fixed line services to make emergency calls."

- Any Ofcom guidance or regulation regarding indoor coverage should be updated to reflect the removal of this requirement, noting we have spoken to various Ofcom departments who are supportive of this.

Ofcom should confirm the removal for repeaters as well as supporting removal of requirement for 2G and/or 3G within JOTS and ensuring removal for 2G and/or 3G signal within any of its own indoor solutions guidance and/or regulation.

2. Do you agree with our proposals to amend the 2022 Regulations and associated Interface Requirements to align the use of in-vehicle mobile repeaters with the provisions for use of indoor repeaters? If not, please set out your reasons with any supporting evidence.

Cellnex UK does not have any comment to make on these proposals.