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Freshwave's response to Ofcom's consultation "Mobile phone repeaters - Proposed changes to the Wireless Telegraphy (Mobile Repeater) (Exemption) Regulations 2022" dated 24th October 2023

Freshwave welcomes the opportunity to respond to the above consultation ('the 2023 Consultation').

Freshwave invests expertise and capital in digital infrastructure. We are a leading connectivity infrastructure-as-a-service provider, bringing together mobile operators, public authorities and real estate providers to extend high quality coverage and capacity in thousands of locations across the UK, including within 2000+ buildings.

We support Ofcom's objective to secure the optimal use of spectrum and the availability of a wide range of electronic communications services, and its priority for "Getting everyone connected". The small cell and distributed antenna systems Freshwave designs, deploys and manages extend coverage without adversely affecting the quality of service (QoS) of the existing mobile networks. They are built with the collaboration of the mobile network operators (MNOs) to ensure inbuilding coverage does not interfere with outdoor coverage, and use dedicated connections to the MNO cores. Indoor repeaters, by contrast, share capacity with the existing MNO cell, affecting the QoS for other users.

Freshwave responded¹ to Ofcom's earlier consultation "Mobile phone repeaters" dated 19th May 2021 in which we (together with three MNOs) expressed our concerns at the proposed loosening of the regulations. In particular we believe there is a risk that large repeater deployments, sometimes providing coverage for hundreds of users in a single building, will cause a significant step increase in uplink noise thereby adversely affecting the QoS and/or coverage for other users.

Nevertheless we are supportive of the change to the regulations on static indoor repeaters proposed in the 2023 consultation. Freshwave's responses to the questions posed in the consultation are given below.

Question 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.

¹ https://www.ofcom.org.uk/data/assets/pdf_file/0025/223828/Freshwave.pdf

Yes we agree with Ofcom's proposal.



Question 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.

We have no comment on these proposals.