

Intel Corp (UK) Ltd

Intel Corporation appreciates the opportunity to respond to Ofcom's "Consultation and information on technical licence conditions for 800 MHz and 2.6 GHz spectrum and related matters". Intel is a world leader in computing innovation. The company designs and builds the essential technologies that serve as the foundation for the world's computing devices.

Technical licence conditions for the 2.6 GHz band

Question 3: Do you agree with the proposed conditions on antenna placement that would permit the use of the alternative block-edge mask for restricted unpaired blocks? If not, please explain your reasoning and your alternative proposals, bearing in mind the need to remain consistent with the framework provided in Commission Decision 2008/477/EC.

Question 4: Meeting the conditions on the use of the alternative block edge mask for restricted TDD blocks would require certain licensees to share information about the locations of their base stations. Do you agree with this proposed approach?

Intel supports the concept of permitting operator coordination in order to better utilize the restricted blocks.

Low-power shared access in paired 2.6 GHz spectrum

Question 5: We welcome comments on stakeholders' preference for the dedicated or hybrid options for low-power shared access as discussed above.

Question 6: We welcome comments on the appropriate frequency placement for low-power spectrum blocks.

Question 7: Do you agree with our proposed technical licence conditions for low-power access?

Question 8: We welcome comments from stakeholders on the additional restrictions and technical measures we have outlined for the management of interference under the hybrid approach, and the technical licence conditions that would be necessary to implement them.

Question 9: Do you agree that a Code of Practice on Engineering Coordination, as outlined, is the appropriate approach to manage the coexistence between low-power licensees?

The 2.6 GHz band offers great promise for the provision mobile broadband services to users and is therefore extremely valuable to operators. While Intel believes low-power base-stations may become an important component in the architecture of a mobile broadband network, we do not believe Ofcom should partition any portion of this valuable band for this specific purpose. We note that the existing proposed non-technical rules for the band, in particular concurrent transfers¹, would allow for the creation of a shared access regime without precluding the possibility of normal high-power use. Furthermore, technical innovation and market conditions may change over time and restricting use of the band to low-power may restrict United Kingdom citizens from benefiting from further innovation. Accordingly, because the opportunity costs due to lack of flexibility are great and because other market-based mechanisms exist to achieve the same results, Intel agrees with multiple respondents to this proposal in the earlier consultation² that Ofcom should not restrict any portion of the band to shared, low-power use.

Terminal Stations

Question 10: Do you agree that we should proceed with the approach that terminal stations complying with the relevant technical parameters be exempted from the requirement for individual licensing?

¹ Intel also believes that shared access could be facilitated further by allowing leasing for auctioned licences in the 800 MHz and 2.6 GHz bands and encourage Ofcom to do so expeditiously when the revisions to the EU Regulatory Framework have been implemented.

² Consultation on assessment of future mobile competition and proposals for the award of 800 MHz and 2.6 GHz spectrum and related issues. In particular see responses of Vodafone, Three, Telefonica UK, and UK Broadband.

Intel concurs that terminal stations which comply with the relevant technical parameters should be exempted from the requirement for individual licensing.