

**Representing:**

Organisation

**Organisation (if applicable):**

Deutsche Telekom AG

**What additional details do you want to keep confidential?:**

Keep name confidential

**If you want part of your response kept confidential, which parts?:****Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:****Question 1: Do you have comments on Inmarsat's planned use of the spectrum, our planned approach to authorising the overall MSS and CGC system, the availability of the Network and Spectrum Access 2 GHz Licences, or any other aspect of the scope and purpose of this document?:**

- Deutsche Telekom (DT) is pleased being able to comment on Ofcom's „Authorisation of terrestrial mobile networks complementary to 2 GHz Mobile Satellite Service (MSS)" published on 22nd February 2016.
- Since 2015 Inmarsat and DT are cooperating to deploy the European Aviation Network (EAN), a combined MSS Satellite and terrestrial network using the same spectrum to provide broadband links to some 5000 commercial airplane travelling in the European airspace. DT, being a fixed and mobile network operator in some 15 European countries as well as in the US, plans to deploy more than 300 EAN base stations in EU28+Switzerland+Norway starting in 2016. This will create an enormous economic benefit for the UK and the whole European Union.
- The deployment of the EAN system goes fully in line with the European framework on MSS licences as correctly stated in Ofcom's analysis.
- Work in CEPT has shown clearly that an airline connectivity system is being requested by the market, however, that the realization is very difficult; EAN is the most promising approach and beyond, will bring Europe into a leading position worldwide.
- DT appreciates that Ofcom plans to license the terrestrial EAN base stations in the UK that will supplement Inmarsat's satellite network covering the airspace of the UK.
- Nevertheless it is very important, that the license will be granted as soon as possible to give DT und Inmarsat planning security on their investments in the infrastructure to an earliest point in time.

**Question 2:Do you have any comments on the technical conditions we propose to include in the Network 2 GHz Licence? :**

- The conditions described by Ofcom in the consultation are considered as appropriate and are supported by DT.

**Question 3:Do you have any comments on our proposals for the fee level, fee structure and implementation of the location factor for the fee for the Network 2 GHz Licence?:**

- DT welcomes the Ofcom proposal to set an individual fee for CGC/base stations as an alternative to a nationwide license. The EAN is a low density network being specialized to generate capacities in the airspace as requested by international airlines and their passengers. This service is clearly not addressing the terrestrial mass market.