

**Additional comments:**

**Question 4.1: Do you agree with our assessment of the competition concerns relating to national wholesale competition that could arise if the auction took place with no measures to promote competition? Please state your reasons for your views.:**

**Question 4.2: Do you agree that option 4 should be adopted to promote national wholesale competition? Please state the reasons for your views.:**

**Question 4.3: Do you agree that the portfolios in group 2 (middle portfolios) of option 4 are likely to be most appropriate and proportionate implementation of this option?:**

**Question 4.4: Do you believe that geographically split licences for a particular block of 2.6 GHz spectrum between standard power use and lower power use is likely to create significant additional benefits for consumers?:**

**Question 4.5: Please provide your views including the reasons for them on which options you believe should be taken in relation to promoting low power shared use of 2.6 GHz spectrum. :**

**Question 5.1: Do you have any comments on the proposal to include a coverage obligation in at least one of the 800 MHz licences, and the proposed extent of such a coverage obligation?:**

We fully support a greater roll out of higher quality data services to a wider population including rural areas. Aylesbury Vale has a considerable volume of entrepreneurial businesses in our rural area which underpin large elements of South East Midlands Local Enterprise Partnership, and nationally recognised centres of engineering excellence such as Silverstone and its supporting supply chains.

These businesses all need high speed data coverage to enable them to operate. Whilst the BDUK funding for the area will help increase coverage, mobile high speed data is likely to still have a role to play in supporting the economic success of the area. In supporting the economic role, this will of course also support the wider community, especially in more rural locations. This also facilitates the growth of such business by securing high speed mobile broadband which will be a significant factor in their contribution to national economic recovery.

It is crucial therefore that OfCom include a coverage obligation to avoid the risk of operators cherry picking only the more intensively used areas.

**Question 5.2: Do you have any comments on which of the two approaches proposed for the specification of such an obligation would be preferable: Approach A, which would require the licensee to provide a 4G mobile data service to an area within which at least 98% of the UK population lives:**

We strongly support Approach B. This has the additional added value of ensuring some element of local sensitivity through how BDUK/MIP investment is targeted locally, and therefore enables some level of local influence on the coverage that will eventually ensue.

Approach A has the danger that this will simply focus investment in limited areas across the country to achieve the overall target, rather than linking this with an overall approach of neutral broadband technology.

We support OfComs stance that the targets should be measured as indoor targets, as most of data use is made indoors.

**Question 5.3: Do you have any comments on our assessment that it is unlikely to be proportionate to impose such a coverage obligation on more than one licensee?:**

We feel that there is a danger in restricting competition and therefore restricting consumer choice if this type of obligation is only included in one of the licenses.

This should either be included in all licenses, or there should be obligations placed on the holder of such a single license to have to enable interoperability across their network to other providers.

This is the same type of approach that DCMS is considering taking on its overhead wire relaxation consultation and we would promote a similar approach to ensure that consumers at least had an option of supplier.

**Question 5.4: Do you have any views on the costs and benefits of a wholesale access obligation on the licensee with the coverage obligation in respect to those areas beyond existing 2G mobile voice coverage?:**

**Question 5.5: Do you have any comments on the possibility that we may in certain limited circumstances consider granting concurrent licences as set out in paragraphs 5.88 to 5.93?:**

**Question 6.1: Do you agree with our revised proposals for the packaging of the 800 MHz band? Please state the reasons for your preference.:**

**Question 6.2: Do you agree with our revised proposals for the packaging of the 2.6 GHz band? Please state the reasons for your views.:**

**Question 7.1: Do you agree with our revised proposals for the number of eligibility points that should attach to each lot? Please state the reasons for your views.:**

**Question 7.2: Do you have any comments on the proposed auction rules as explained in section 7, Annex 11 and Annex 12? Please state the reasons for your views.:**

**Question 8.1: Do you have any comments on the Additional Spectrum Methodology as one of several sources of information for estimating the full market value of spectrum?:**

**Question 8.2: Do you have any comments on our updated thinking on estimating full market value for the purpose of revising ALF as set out in this section and Annex 13?:**

**Question A7.1: We would welcome comments on any aspect of the data, assumptions and modelling methodology we have used in our technical analysis, in particular our approach to serving users in a range of both easier and harder to serve locations.:**

**Question A7.2: We would welcome any additional information, in particular from current operators, on the choice of parameters making up our ?Min var and ?Max var? cases.:**

**Question A8.1: Do you agree with our assessment of when Everything Everywhere, Vodafone and Telefónica are likely to be able to refarm their existing 2G spectrum? In particular, do you agree with our views on the importance of user devices and the likely availability and take-up of devices that use different technologies and bands? Please state the reasons for your views, including if appropriate your views on handset roadmaps and the practical constraints which apply to those roadmaps.:**