

## **Ofcom Advisory Committee for Northern Ireland**

### **Consultation Response**

#### **Second consultation on assessment of future mobile competition and proposals for the award of 800 MHz and 2.6 GHz spectrum and related issues**

Ofcom's Advisory Committee for Northern Ireland (ACNI) welcomes the second consultation on the auctioning of the 800MHz and 2.6GHz spectrum bands for '4G' mobile services which is considering specific coverage and competition issues. Our comments focus on the coverage proposals set out in the consultation.

We support an increased coverage obligation on one of the 800MHz licences to 98% of the UK population and achieved in a way which would map onto the current 2G coverage as well as the additional 2G coverage expected to be delivered by the UK Government's Mobile Infrastructure Project (MIP). In order to deliver the maximum benefit to citizens and consumers, ACNI believes there should also be a guaranteed minimum 4G coverage obligation of 95% by population for each nation.

Northern Ireland has benefitted greatly in recent years from well considered and timely public investments in first and next generation broadband infrastructure, led by the Department of Enterprise, Trade and Investment (DETI). The focus of these investments has been in fixed-line infrastructure, although DETI is currently examining the economic case for delivery of improved access to mobile voice and data services.

ACNI would urge Ofcom to ensure that there is maximum co-ordination and "joined-up thinking" between Ofcom's Mobile Not-spots project, the UK Government's Mobile Infrastructure Project, the conditions regarding coverage obligations contained in the 800MHz and 2.6GHz licences and the possible availability of investment funds from DETI. Such co-ordination will be vital to ensuring that infrastructure deficits in Northern Ireland are tackled in the most effective and efficient manner possible and that Northern Ireland is well placed to move on with a communications infrastructure that supports both rural and urban communities in equal measure and is therefore effective and forward looking for citizens, business (including SMEs, agri-business and social enterprise) and the delivery of public sector services.

In our response to the first 4G consultation, ACNI expressed concern about the lack of competition if a coverage obligation only rested on one 800MHz licensee. We note from the current consultation that Ofcom intends neither to place coverage obligations on more than one licensee nor to place wholesale access obligations on this licensee. ACNI therefore repeats its suggestion that in this case passive network sharing with other operators should be encouraged at every opportunity, especially in rural areas. Ideally this would also be the case for MIP infrastructure and ACNI would hope that careful consideration would be given to this as the MIP procurement process develops. It would be an opportunity lost not to achieve this outcome at this point in time.

It is clear that MIP and the 4G auction are now inextricably linked and the success of the former will influence the success of the latter in terms of delivering high quality mobile services to those parts of the UK that are currently underserved. ACNI is keen to follow how the MIP develops, in particular how the not-spots identified across the UK are then prioritised. Ofcom will play an important advisory role to the MIP and while MIP is targeting 2G voice coverage, we would hope that the evidence base Ofcom presents will acknowledge how Northern Ireland has been underserved in terms of mobile coverage, most obviously in terms of 3G coverage. It is therefore essential that Northern Ireland receives a fair share of MIP investment which will form an important platform for the rollout of 4G services in a way which benefits citizens and consumers in Northern Ireland.

**Ofcom ACNI**

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