

Angus MacNeil MP

The most important portion of this consultation to my constituents is section six. Therefore, I have answered that section only.

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Question 6.1: Do you have any comments on the proposal to include in one of the 800 MHz licences an obligation to serve by the end of 2017 an area in which 95% of the UK population lives, while providing a sustained downlink speed of 2Mbps with a 90% probability of indoor reception? Do you think there is another way of specifying a coverage obligation that would be preferable?:

The best way to ensure coverage to the most people is to ensure is part of your coverage parameters are based on geography. Having a responsibility for covering 95 percent of the UK population equates to 58.74 million people covered. However, that same number leaves 3.09 million people without coverage at all. I have a hard time understanding how that can be considered real progress.

Additionally, in rural areas we find that coverage will be strong for one company but lacking for another in one area. If users were allowed to roam on others networks many of the coverage issues could be addressed. Roaming is used all over the world and could be used locally. The Faroe Islands allow roaming and have 50 3G masts, signal in undersea tunnels and, methods to make 3G mobile available 200 km out to sea.

Mainland European and Manx mobile companies have roaming capability however it seems to be beyond the grasp of the UK. The excuses for not implementing this ability are weak and I hope that we will be able to have at least voice roaming as part of the new licenses.

As my constituency contains the Outer Hebrides with a population of just 26,000, I can expect that even the most robust 4G coverage will struggle to reach even Stornoway. OfCom knows that Scotland has been historically underserved by MNO's. These new licenses must address this issue with rules that give us the same coverage as the rest of the UK. As regulator, it is your job to ensure that we ALL receive the same quality of coverage. If it can be done on the distant Faroe Islands and Rwanda why can't it be done here? As a result I have approached the Scottish Government to devolve this competence.

Question 6.2: We would welcome views and evidence on the costs and benefits of imposing an additional coverage obligation focussed on particular geographical areas, and if such an obligation were to be imposed what might be the appropriate specification of geographic areas?:

The costs of bringing coverage out to rural areas could be mitigated by using the current mast infrastructure to replace and enhance areas of weak coverage and find ultra-local solutions to dealing with these issues. For example, companies can insure that spare parts and staff are based in Stornoway to address faults quickly. OfCom could base small rotating teams or signal monitoring equipment in rural areas to insure that MNO coverage guidelines are being

met. OfCom should also investigate the pricing structures of large communications providers such as Arqiva and WIG who have been suspected in engaging in excessive mast profiteering.

My recommendation for a geographical obligation is the Islands and Highlands of Scotland. For decades we have been neglected by successive UK Governments, broadband providers and, OfCom. By your own study Scotland has the lowest broadband coverage of any part of the United Kingdom and until this consultation there have been few attempts to address this problem. With this obligation in place companies that may have previously provided 'bare minimum' services now have to provide well-deserving people with a good level of coverage.

Question 6.3: Do you have any comments or evidence on whether an additional obligation should be imposed to require coverage on specific roads?:

Main routes should be identified and have full mobile coverage. Roads such as the Hebridean Spinal Route (B8013, A857, 858,859,868,865,867 and, B888) have very patchy coverage with several areas of no coverage at all. In May of 2011 the Hebridean Communications Summit met in Stornoway and agreed that this route should have full coverage, if only, for better signal quality for the emergency services. I use the Spinal Route as an example however; I know that this situation has run rife throughout the Hebrides as well on the mainland specifically the Highlands.

Question 6.4: Do you have any comments on our proposal not to use the combined award to address existing not-spots?:

I think that these licenses are intended to improve coverage overall and, hopefully; the new coverage parameters plus the geographical commitments should address the not spot issues. However, if the not-spots are not identified properly then this frequency roll-out will be an exercise in futility because, we in the Hebrides will incur the same issues that we deal with now which are areas of no coverage. I think that the new license should make provision for identifying rural not-spots so mobile companies know where to target their new resources. I believe companies can still help address these issues in the short-term by working together to address not-spots until 4G arrives in the Hebrides. Targets must also be set to improve coverage for the excluded 3.09 million people in a given time period. They should not be left behind because they live outside of a major population area. Local roaming must be allowed where networks are only providing patchwork coverage. While the companies may be competing for business, the quality of either network's coverage will be so low that it becomes a 'free money' situation to the network providers because; providers are taking money for level of service they are not providing which ultimately helps no one have a comprehensive useful network.

Question 6.5: Do you have any comments on our proposal not to impose 'use it or sell it' obligations but to consider including an additional power to revoke during the initial term of the licences?:

I agree that the OfCom 6.54 argument should be used in place of 'use it or sell it.' My constituents strongly believe that if a company is not providing the service that they promise

then OfCom should be allowed to revoke their license or give that license to a company that can provide better service. I think this would provide greater service through competition through the satisfaction of end user service. MNOs would have to compete based on their track record as opposed to their reputation. The best way to test this is to send a small team to rural areas, such as the Hebrides and meet with them on an annual basis to see if the MNOs are actually doing their job by fulfilling coverage obligations