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What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

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Yes

I confirm that I have read the declaration:

Yes

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Additional comments:

Response by GSA (Global mobile Suppliers Association) to Ofcom Notice of proposed variation of Everything Everywhere's 1800 MHz spectrum licences to allow use of LTE and WiMAX technologies

GSA, the Global mobile Suppliers Association, welcomes this opportunity to comment on Ofcom's Notice of proposed variation of Everything Everywhere's 1800 MHz spectrum licences to allow use of LTE and WiMAX technologies.

GSA is an industry trade association with a globally established reputation for reporting the facts on mobile broadband developments and trends worldwide. This includes providing independent and objective information about the status of mobile broadband services enabled by LTE, where we report on worldwide operator commitments, network deployments, commercial service launches, user device announcements, etc. We are therefore most interested in Ofcom's policy initiatives which are designed to introduce technologies such as LTE into the UK market during this year.

We recall how the strong political will, focus, commitments and efforts of Europe's politicians and key industry stakeholders - especially with the engagement of the five major economies of France, Germany, Italy, Spain and the UK, combined to lay the foundation for the successful introduction of GSM and UMTS services in Europe, eventually expanding worldwide and achieving phenomenal market success. Today the UK is absent from the LTE table, is the only nation from the five leading economies of Europe which has not allocated new spectrum for 4G services, and risks losing its industry leadership and pioneering positions. GSA believes that the UK must be an active participant in 4G at the earliest opportunity to help drive future LTE investments in Europe and globally, and encourage more technical innovation, which in turn would help to deliver the maximum benefits from 4G/LTE including economies of scale, and services innovation for UK consumers and businesses.

The first commercial LTE services were launched in 2009, in Sweden and Norway. According to GSA data published on May 8, 2012 (Evolution to LTE report - www.gsacom.com) 72 LTE networks are already commercially launched in 37 countries. GSA forecasts there will be 134 commercial LTE networks by December 31, 2012. LTE is the fastest developing mobile system technology ever.

The UK is at serious risk of remaining as a non-participant in the 4G advanced mobile broadband market even as LTE is poised to enter the mainstream by end 2012, which would be most regrettable, unless LTE network deployment in re-farmed spectrum is allowed.

GSA applauds Ofcom's stated policy intention to permit deployments of LTE technology in re-farmed spectrum, as requested by Everything Everywhere within their existing 1800 MHz spectrum allocation. LTE is the most advanced mobile communications system technology and is available now, already attracting investment from more than 300 operators in almost 100 countries. LTE is market reality and is benefiting millions of customers in Europe and indeed all regions of the world. There is huge industry momentum and commitment to LTE, which is also demonstrated in the rapidly establishing ecosystem for LTE-capable user devices, including

smartphones, tablets, dongles, routers, laptops, etc. GSA has confirmed that 347 LTE user devices have been announced by 63 manufacturers (Status of the LTE Ecosystem report - April 3, 2012). There is a choice of several LTE user devices which can operate in 1800 MHz spectrum.

1800 MHz (i.e. 3GPP band 3) is expected to be a prime band for LTE deployments in most regions of the world. Commercial LTE services have been launched in this band by 18 operators to date, in Angola, Australia, Croatia, Denmark, Finland, Germany, Hong Kong, Hungary, Latvia, Lithuania, Poland, Saudi Arabia, Singapore, South Korea, and UAE, with many additional deployments on-going in more markets. GSA published a report "Embracing the 1800MHz opportunity: Driving mobile forward with LTE in the 1800MHz band" in November 2011 (available on www.gsacom.com) which explained and demonstrated the strong appeal of using 1800 MHz spectrum for mobile broadband, showing from practical, economic and business perspectives why 1800 MHz will emerge as a prime band for LTE deployments in virtually all regions of the world, and also be important for international roaming. Manufacturers have responded swiftly to market requirements and strong operator interest by announcing a full range of LTE1800 user devices, and there are around 10 times as many LTE1800 products today compared to the situation which existed a year ago.

Note that LTE is deployed and carrying live commercial traffic using 800 MHz and 2.6 GHz and can eventually be deployed in 900 MHz and 2.1 GHz, and suitable user devices are also available in all these bands.

Ofcom raises the point about the potential risk of distortion to competition arising from the potential of one entity achieving national coverage for a period of time before others. In our experience operators have deployed LTE as a complement to existing mobile broadband systems - which are typically HSPA or HSPA+ with GSM/EDGE, either for extended rural coverage (for which sub 1GHz spectrum is well suited e.g. digital dividend) or for capacity where 2.6 GHz is the prime band. Many operators in Europe have chosen a multiband LTE strategy (800 MHz, 1800 MHz, 2600 MHz) as the only way to achieve the nationwide proposition. And investments are continuing in their HSPA/HSPA+ networks. According to our knowledge of LTE markets worldwide, no European operator has yet claimed it has a nationwide LTE service.

We thank Ofcom for providing this opportunity to comment on their important policy considerations and we hope that our response will be of assistance and duly considered.

If further clarifications are needed or if additional information is required, we remain ready to respond accordingly.

Sincerely,

Alan Hadden, President, GSA
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