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Nokia¹ response to Ofcom consultation on 800MHz band clearance

The costs and benefits of clearing the 800 MHz band

Question 1. Do you agree that clearing DTT from channels 61 and 62 and PMSE from channel 69 to align the upper band of cleared spectrum in the UK with the emerging digital dividend in other European countries is likely to further the interests of citizens and consumers to the greatest extent?

Yes, use of the 800MHz band for mobile broadband will help maximize the economic benefits. By the same token we believe Ofcom should also reduce risk/maximise potential benefit by not allowing mobile devices to transmit in channels 61-64, as elaborated in our answer to Q16.

There are also likely to be environmental benefits, which should be considered.

We would also like to re-iterate a comment we made in response to your consultation last year on the auction process. Finance has become even more difficult to obtain and there is a strong argument for reducing the up front bid costs by re-introducing an annual spectrum fee.

Moving DTT from channels 61 and 62

Question 2. Do you agree that the proposed DTT migration criteria are proportionate and appropriate? If not, please explain why and clearly identify any other criteria you believe should be adopted and why.

yes

Question 3. Do you have views on the options identified and our assessment of them? Do you believe there are other, superior options, and, if so, why? Do you agree that the hybrid option is most consistent with the DTT migration criteria?

yes

Question 4. Do you have views on the implementation-timing options identified and our assessment of them? Do you agree that DSO-integrated implementation is most consistent with the DTT migration criteria? If not, why not?

yes

Question 5. Do you agree that a programme-control and -governance arrangement

¹ **About Nokia**

Nokia is a world leader in mobile communications, driving the growth and sustainability of the broader internet and communications industries. Nokia connects people to each other and the information that matters to them with easy-to-use and innovative products like mobile phones, devices and solutions for imaging, games, media and businesses. Nokia provides equipment, solutions and services for network operators and corporations.

TypeUnitOrDepartmentHere
TypeYourNameHere

TypeDateHere

such as that outlined above is appropriate?

No comment

Question 6. Do you agree that the four cost categories adequately capture the costs associated with clearing DTT from channels 61 and 62? Are there any costs that do not appear to have been accounted for in any of these categories?

No comment

Question 7. Do you agree that our cost profile is a reasonable basis for planning the capital expenditure for clearing DTT from channels 61 and 62?

No comment

Moving PMSE from channel 69

Question 8. Do you agree that these are the most appropriate criteria to assess which spectrum is the best alternative to channel 69 for PMSE?

Yes

Question 9. Do you agree with our technical and coverage analysis of the possible alternatives to channel 69 for PMSE?

No comment

Question 10. Do you agree with our economic assessment of the realistic alternatives to channel 69 for PMSE?

No comment

Question 11. Do you agree that channel 38 is the best alternative to channel 69 for PMSE?

No comment

Question 12. Do you agree that we should award channel 38 to the band manager on the same terms as would have applied to channel 69?

No comment

Question 13. Do you agree with our proposal to maintain PMSE access to channel 36 on 12 months' notice to cease and to the rest of the cleared spectrum (channels 31-35, 37 and 61-69) until DSO is completed in the UK in late 2012?

Yes

Question 14. Do you agree with our approach to determining eligibility for, and our assessment of the level of, funding to move PMSE from channel 69?

Question 15. Do you agree that three years is long enough for PMSE to move from

TypeUnitOrDepartmentHere
TypeYourNameHere

TypeDateHere

channel 69?

No comment

Impact assessment

Question 16. Do you agree that with our analysis of the key impacts of our policy options? Are there any other key impacts we should assess?

Broadly yes.

However is not clear how Ofcom have calculated the extra cost of using unharmonised spectrum. The document appears to imply that equipment costs would be higher. However, it is very likely that there will be no UK-specific terminals. In reality it is likely that standard terminals would be used (whenever possible) and in the areas where channel 61/62 are used for broadcast, the mobile service would be restricted. This would reduce the spectrum value.

With all four options it is also necessary to consider the possibility of TDD licensees operating in the FDD downlink band. CEPT-SE42 and PT1 do not recommend such mixed deployment, but the Ofcom policy does not barr it. We would encourage Ofcom to adopt the CEPT recommendation.

It is possible that the bids will be reduced in a mixed FDD/TDD-scenario and there will be an increased risk that the spectrum will lie unused for longer, as a result of greater uncertainties. Notwithstanding any reflection in the bids, interference will also impact consumer benefits. We contend that in the same way that harmonising the use of Ch 61, 62 and 69 increases economic benefit, so would harmonising the FDD/TDD boundaries and using the same frequency arrangement (band plan) throughout Europe. The use of a common band plan does not compromise technology neutrality since LTE and Wimax, for example, could both be used, as they have both FDD and TDD modes.