

Your response

Question	Your response
<p data-bbox="188 488 754 629">Question 1: (Section 4) Do you agree with our proposals on the coverage obligations as set out in this section? Please give reasons supported by evidence for your views.</p>	<p data-bbox="794 488 970 517">Confidential N</p> <p data-bbox="794 524 1369 801">We have concerns over the timing of this auction and the coverage obligations as it comes at a time when 5G deployment will be happening which will mainly effect Urban areas and 4G rural will be forgotten by the operators as there is no money in it for them. They may not bid for the rural coverage relief for that reason.</p> <p data-bbox="794 846 1374 1055">The stated levels of coverage by the mobile operators are vastly different to what user experience is on the ground, and this needs to be addressed unless the coverage improvement will meet Ofcoms requirements without addressing the issues of the nation.</p> <p data-bbox="794 1061 1374 1518">North Yorkshire County Council undertook their own survey in order to ascertain the levels of coverage and would be willing to share these with Ofcom as they differ vastly with the MNO's stated levels (estimated 15% overstated). The levels of coverage is poor by the operators generally, however some coverage by one or two operators in an area provides for poor user experience. There needs to be a mandated level of coverage for all the operators geographically by county at 90% not nationally, that way overcoming the rural divide on coverage.</p> <p data-bbox="794 1563 1369 1951">Ofcom must incentivise the commercial use of the Emergency Services Masts. These masts will provide a large increase in coverage if commercialised and should not be left out of the auction. They were sold to the planning authorities and local residents as going to have commercial services operating from them. Many are in areas where they are not commercially viable for the operators to work from therefore licence incentives is the only way to get coverage in these areas.</p> <p data-bbox="794 1989 1350 2018">The further 500 rural masts must be on top of</p>

the 250 Emergency Services Masts if coverage is to be improved. The % of 4G coverage should be 90% geographic without ESN masts and 94% with. The operators claim that the ESN masts will not be ready in time could be overcome if they are required for coverage obligations as this would increase the reason to build many of them. The reduction from 92% geographic coverage to 90% for England is a poor step and will still leave rural largely disadvantaged.

Rural roaming should be mandated for those not having suitable coverage in an area. If this were to happen then operators would either have to comply with this or build the required infrastructure to support their own network.

The Operator role out has almost ceased in 2018 following the completion of recent obligations. Within North Yorkshire we were seeing between 40 and 50 site applications over the previous 3 years, this dropped to 8 in 2018 with 4 of these being EE's ESN commitment. This is proof that without obligation the industry will not expand rurally.

The time to deliver these masts should not be extended to 4 years. The examples that the operators are pointing to are historic and there has been a change in people attitudes to mobile infrastructure and the realisation that it is required. The National Parks have signed a memorandum of understanding to work with the operators to provide suitable sites. By using the pre-application planning process times can be reduced drastically in this process. DCMS and industry have worked to provide best practice guidance and if this is utilised then again timescales can be cut. The experience within North Yorkshire is that it is the operators own internal processes that are slowing the building process down, with timescales from initial site proposal to receiving HOT's taking 15 month despite there being a willing landlord. 3 years should be a maximum with a bonus given for early attainment. This will encourage the operators to expedite infrastructure delivery.

<p>Question 2: (Section 5) Do you agree that we have identified the correct competition concerns?</p>	<p>Confidential? N Yes we agree you have identified the correct competition concerns.</p>
<p>Question 3: (Section 5) Do you agree with our assessment of these competition concerns, and our proposed measure for addressing them? Please give reasons supported by evidence for your views.</p>	<p>Confidential? N Yes we agree with the proposed measures to overcome the concerns with the maximum cap being the fairest way of doing this.</p> <p>However we do have concerns over O2 buying the majority of the spectrum and then offering to cover 90% geographic which could in England be achieved without any additional infrastructure by deploying the lower frequency. They would not need to deploy the additional 500 rural sites therefore not bidding for the reduction.</p>
<p>Question 4: (Section 6) Do you agree with our proposal to proceed with a conventional assignment stage?</p>	<p>Confidential? – N No Comment</p>
<p>Question 5: (Section 7) Do you agree with our proposal to use a CCA design for this award?</p>	<p>Confidential? – N No Comment</p>
<p>Question 6: (Section 7) Do you have any comments on the proposed detailed rules for our CCA design?</p>	<p>Confidential? – N No Comment</p>
<p>Question 7: (Section 8) Do you agree with our proposed approach to coexistence in the 700 MHz band?</p>	<p>Confidential? – N No Comment</p>
<p>Question 8: (Section 8) Do you have any comments on the proposed licence obligation and guidance note (annex 19)?</p>	<p>Confidential? – N No Comment</p>
<p>Question 9: (Section 9) Do you agree with our proposed approach to managing interim protections for registered 3.6-3.8 GHz band users?</p>	<p>Confidential? – N No Comment</p>

<p>Question 10: (Section 9) Do you agree with our 3.6-3.8 GHz in-band restriction zone proposals?</p>	<p>Confidential? – N</p> <p>No Comment</p>
<p>Question 11: (Section 9) Do you agree with our view that we do not need to include any specific conditions in 3.6-3.8 GHz licences to mitigate the risk of adjacent band interference?</p>	<p>Confidential? – N</p> <p>No Comment</p>
<p>Question 12: (Section 10) Do you agree with the non-technical conditions that we propose to include in the licences to be issued after the award of the 700 MHz and 3.6-3.8 GHz bands?</p>	<p>Confidential? – N</p> <p>We agree with the conditions but have some concern over the potential interference with the current DTT signals and leaving the market to decide on the responsibilities to overcome effected users. Many users will not know the reason for the interference of poor signal.</p> <p>This should be a mandated process made clear to all users, and the costs borne by Arqiva & the MNO's. This could be via a voucher scheme.</p>
<p>Question 13: (Section 11) Do you agree with the technical licence conditions we propose?</p>	<p>Confidential? – Y / N</p>