

**Response to Ofcom's
Consultation:
Proposals to make
auction regulations
for the 1.4 GHz award**

Introducing VodafoneThree

In June 2025, Vodafone UK and Three UK merged to become VodafoneThree. This is the start of an exciting new chapter in UK communications, allowing citizens and consumers to benefit from a market leading operator with the scale, resources and innovative spirit to deliver game-changing connectivity for the UK.

The merger brings with it a commitment to deploy spectrum extensively, and if awarded the rights, we will similarly utilise the additional 1.4 GHz spectrum in an efficient manner.

Response to Consultation question

Question 1: Do you have any comments on our proposals to make the Wireless Telegraphy (Licence Award) Regulations [2026], which are set out in draft form in Annex 6?

VodafoneThree welcomes the opportunity to comment on the draft regulations that set out the procedures to be adopted during the award of 1.4 GHz spectrum. **We have reviewed the regulations in detail and are satisfied that they give effect to the policy as set out in Ofcom's Statement of 11th June 2026.**

Under the second price rule (Regulation 24), the price paid by the winning applicant will be that bid by the next highest bidder (other than where identical bids are submitted – Regulation 24(2)(b)). This means that Regulation 28, dealing with the refund of deposits, will result in reimbursing all bidders, either partially (the winner receiving the amount their winning bid was in excess of the second-place bidder) or fully (for the losing bidders). Therefore, most of the funds held on deposit by Ofcom will be returned to the bidders.

However, Regulation 28 does not include any provision for how swiftly the excess funds will be returned to the bidders. We believe that it would be appropriate for the Regulation to specify this, for example that the funds will be returned within a maximum of seven days. This would provide both financial certainty for the bidders and support efficient administration by Ofcom.



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