

## Arqiva response to the Providing Spectrum Information consultation

### About Arqiva

Arqiva has its headquarters in Hampshire, with other major UK offices in Warwick, London, Buckinghamshire and Yorkshire. It now has 9 international satellite teleports, over 70 other manned locations, and around 9000 shared radio sites throughout the UK and Ireland including masts, towers and rooftops from under 30 to over 300 metres tall.

Arqiva has over 50 years' experience in delivering universal coverage broadcasting services with the highest levels of service 24/7, 365 days per year; in the communications sector the company supports cellular, wireless broadband, video, voice and data solutions for the mobile phone, public safety, public sector, public space and transport markets.

Major customers also include the BBC, ITV, Channel 4, Five, BSkyB, Classic FM, all 5 UK mobile operators, Viacom and Turner Broadcasting.

Arqiva is supported in all of the above by its extensive Spectrum Planning Group and a national field force, key assets underpinning Arqiva's rôle managing all of the technical aspects of the Digital Switch Over (DSO) from analogue television to digital (i.e. Freeview, of which Arqiva is a founder member) - the largest public policy infrastructure project other than the 2012 Olympics.

Arqiva is also the licensed operator of 2 of the UK's 6 Digital Terrestrial Television (DTT) multiplexes and has exploited its technical expertise to enhance the efficiency with which our multiplexes use their spectrum, increasing the number of video streams that can be delivered. Arqiva is also the licensed operator of the national commercial DAB multiplex, Digital One.

For broadcasters, media companies and corporate enterprises Arqiva has end-to-end capability ranging from -

- outside broadcasts (10 trucks including HD, used for such popular programmes as Antiques Roadshow, Question Time, Proms in the Park and a wide range of sporting events);
- satellite newsgathering (30 international broadcast SNG trucks);
- 10 studios;
- playout (capacity to play out over 70 channels including HD);
- satellite distribution (over 1200 services delivered); to
- terrestrial transmission, the latter including DSO and mobile TV development.

Arqiva has purchased spectrum in two Ofcom auctions (412 MHz and 28 GHz) and owns JFMG, the PMSE band manager.

## Comments on Ofcom's proposals

Arqiva's comments principally relate to the non-EIR information Ofcom is consulting on the future publication of.

Arqiva strongly agrees that the greater availability of spectrum usage data would aid spectrum planning and co-ordination (including for potential applicants for non-operational or innovation licences) and spectrum trading and leasing (where the current lack of information acts as a barrier and unnecessarily raises transaction costs).

As such this would tend to lead to more efficient spectrum usage.

As the consultation states, presently only basic information is provided by Ofcom on individual licences. Such information relates more to ownership than to actual usage. As such it is impossible, without reference to the licensee, for a potential purchaser or tenant to identify spectrum which could be suitable for their purposes.

As proposed, complying with the EIR should significantly increase the transparency around what is actually deployed by spectrum licensees to facilitate estimation of "white spaces" and enable estimation of potential interference from the primary network into potential secondary networks.

But in the meantime there seems no reason why Ofcom couldn't publish technical licence conditions now as part of the details made available on the WTR for each spectrum licence, as these represent the "planning permission" without which a potential purchaser or tenant cannot determine the value to them of some or all of the geographic and/or temporal rights of any tradable spectrum licence.

Similarly Arqiva would support the publication of occupancy data, to the extent that it is available to Ofcom, to aid the identification of un- and under-used spectrum.

In addition, Ofcom could easily provide current licence expiry dates (recognising that licence terms could be extended, albeit that for the Spectrum Access licence class no means has yet been put in place for that).

The prices paid by existing spectrum licensees for their licences is somewhat less important to a prospective new owner or tenant than what could be done with those rights.