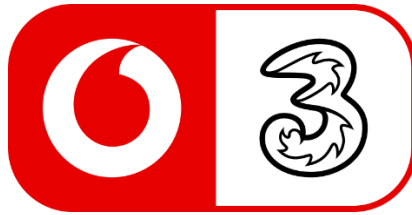


Response to Ofcom's Consultation:

Further consultation on ESN gateway licence commencement date

November 2025

Non-confidential



Introducing VodafoneThree

At the beginning of June 2025, Vodafone UK and Three UK merged to become VodafoneThree. The merger signals the start of an exciting new chapter in UK communications, allowing citizens and consumers to benefit from a market leading new company that has the scale, resources and the innovative spirit to deliver game changing connectivity.

A new era of connectivity

The merger signals not just a transition towards material enhancements in the UK's mobile coverage, but it will create more opportunities for more customers to benefit from competitively priced, quality business connectivity and broadband services.

Connecting every community

Our investment will boost speeds for every customer as we bring 5G Standalone (5G SA) to every corner of the UK by 2034. From busy city centres to remote rural towns, we're making sure every area has the access it needs, including the most vulnerable within society.

To find out more about VodafoneThree, our brands and how we are building the UK's best network, visit: <https://vodafoneandthree.uk/>

VodafoneThree

Table of Contents

Introducing VodafoneThree	2
Executive Summary	4
Answer to Ofcom's specific questions	5

Executive Summary

VodafoneThree welcomes the opportunity to comment on Ofcom's proposal to allow access to the 1910-1915 MHz band ahead of the current licence commencement date, 4 April 2029.

We are supportive of the need to modernise the railway communications network and acknowledge the benefits of Emergency Services Network (ESN) provision. As such, we are broadly supportive of Ofcom's decision to authorise the 1900-1910 MHz for operational rail communications and authorise 1910-1915 MHz to enable the use of ESN gateways in Great Britain, as long as there is no adverse impact to adjacent spectrum users.

However, Ofcom's proposal to grant early access to the 1910-1915 MHz band before the licence commencement date of 4 April 2029 would adversely affect adjacent public mobile networks. To mitigate interference from early ESN gateway deployments, we would need to bring forward the deployment of additional filtering, resulting in a significant financial burden.

Accordingly, we request that Ofcom not provide early access to this spectrum prior to 4 April 2029, as detailed in our response to the consultation questions below.

Answer to Ofcom's specific questions

Question 1: Do you have any views on our proposal to allow access to the 1910-1915 MHz spectrum for use by ESN gateways prior to 3 April 2029?

We acknowledge the public policy benefits of ESN gateways and therefore do not wish to hinder their deployment. However, whilst not the subject of this consultation, it is important to take into account the usage of the remainder of the 1900 MHz band. Now that Ofcom has decided to authorise use of the 1900-1910 MHz band for the Future Railway Communication System (FRMCS), we will need to implement enhanced filtering at our sites located near railway infrastructure to mitigate potential interference into our mobile deployments above 1920 MHz. Where these filters are deployed, the impact of temporary deployment of an ESN gateway using 1910-1915 MHz will be less so than on a site with no such filtering.

Ofcom's authorisation of the 1900-1910 MHz band for FRMCS takes effect from 4 April 2029, allowing time for VodafoneThree to add such filtering. We plan to upgrade only in areas with operational rail usage, as there is a cost implication of doing so of [X]. It is not practicable to accelerate deployment of the additional filtering, as this is tied into the deployment of our existing network upgrade programme, governed by the Network Commitment baked into our 900MHz licence. [X]. Given the scale of this activity, it is simply impracticable to have separate site visits solely for filter deployment, with associated operational disruption.

If Ofcom proceeds with its proposal to enable early access to ESN gateways before April 2029, this means that the volume of sites with no protective filtering would be larger than waiting for April 2029 as originally proposed. Our preference would therefore be to maintain the existing timelines, but we do accept that there may be wider public interest considerations which lead to an acceleration.

Furthermore, ESN gateways can, in principle, be deployed at any location. However, it would be unduly burdensome to upgrade every mast across the network in anticipation of potential police incidents. Therefore, in areas away from railway lines, mobile networks may have no practical alternative but to accept temporary service degradation when an ESN gateway is deployed.

To manage this, it would be appropriate to establish a process under which mobile network operation centres are automatically notified when an ESN gateway is activated. This would ensure that operators are aware of any potential short-term service degradation and can take appropriate operational measures as needed. We do not accept the assertion that it would be impracticable of the ESN operator to provide this notification. It is entirely possible to build the capability into the ESN gateway design to send a notification to a central location of its GPS location when activated and for this to be then onward communicated to the network management centre of adjacent spectrum users. As a responsible corporate citizen, VodafoneThree is prepared to accept the impact to our services at a time of emergency response, but it is only fair that we are made aware so that we are not left dealing with any customer complaints blind to the root cause.

Question 2: Do you have any views on our proposed licence term requiring the licensee to operate on a non-interference, non-protection basis prior to 3 April 2029.

If Ofcom nonetheless proceeds with providing early access to ESN gateway before April 2029, we request that Ofcom also apply this requirement towards adjacent band users in 1920-1980 MHz. This would allow us sufficient time to align the deployment of filters with our network upgrade programme, as noted above.