



Non-Confidential

Ofcom's proposals to update the technical conditions of mobile licences in the 800 MHz band

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Executive summary

1. BT¹ welcomes and supports Ofcom's proposals to increase the power limits permitted under existing Spectrum Access 800 MHz licences. This change should benefit consumers as it will enable better coverage and capacity of mobile networks in some locations.
2. BT accepts that if the increased power limits are to be utilised an interference mitigation scheme should first be put in place to remedy the small number of homes where TV reception might be impacted as a result of the increased power level from 800 MHz mobile base stations.
3. BT agrees with Ofcom's proposals to more closely align the out-of-block and out-of-band emission limits in the 800 MHz licences to those in the recently awarded 700 MHz licences and with harmonised European limits developed in the CEPT organisation.
4. BT agrees with Ofcom's overall assessment of whether it should proceed with the amendments to the Spectrum Access 800 MHz licences after considering the benefits of doing so and its statutory duties.

¹ Including its subsidiary mobile network operator EE Ltd.

1 Introduction

BT welcomes Ofcom's consultation proposals² for the variation of 800 MHz Spectrum Access licences and are pleased to provide our views on the details of these proposals.

The proposed increase of permitted maximum base station power levels and changes to the limits on out of block/band emissions will bring 800MHz licences into close alignment with the recently awarded 700 MHz licences and harmonised European technical conditions and is something that BT supports.

The impact of the changes will be helpful in terms of our ability to deliver improved mobile coverage and capacity in some locations. The associated requirement to address any increased interference to digital terrestrial TV reception will minimise or eliminate any potential adverse effects of the proposals. As Ofcom has noted, where the higher permitted power levels are in future used, the requirement to comply with limits on the level of emissions at locations accessible to the public, as specified in guidelines published by ICNIRP³, are unaffected and would continue to be respected.

Our response to Ofcom's consultation questions follows in section 2 below.

2 Response to the consultation questions

Question 1: Do you agree with our proposals to change the in-band power limits contained in the Spectrum Access 800 MHz licence and Ofcom's assessment of the risk of interference? If you disagree, please provide details

Yes, BT agrees with Ofcom's proposals to increase the in-band power limits contained in the Spectrum Access 800 MHz licences.

Question 2: Do you agree with our proposals to require licensees to have in place a mitigation scheme to resolve any DTT issues should they occur? If not, please provide details.

Yes, BT accepts Ofcom's proposal to require licensees to have in place a mitigation scheme to solve any DTT issues should they occur as the result of operating 800MHz base stations at higher than the currently permitted power.

We note that the licence variation would go ahead before a mitigation scheme is proposed, but the higher permitted powers could not be used until a proposed scheme is reviewed by Ofcom and is operational.

As Ofcom has noted, it may be possible to combine the interference mitigation scheme for use of higher power 800 MHz with existing schemes for 800 MHz and 700 MHz deployments. This would require the incremental costs of the additional mitigation to be identified and suitably apportioned between MNOs that wish to utilise the proposed increased 800MHz power levels. We understand these details are for MNOs to consider and not part of Ofcom's consultation proposals and so do not elaborate further on this aspect here.

² https://www.ofcom.org.uk/_data/assets/pdf_file/0026/221948/800-mhz-variation-condoc.pdf

³ International Commission on Non-ionising Radiation Protection.

Question 3: Do you agree with the proposals to relax the out-of-band emission limits? If you disagree, please provide details.

Yes, BT agrees with Ofcom's proposals in relation to relaxing the out-of-band emission limits.

Question 4: Do you agree with the proposals to reintroduce the transitional out-of-band and out-of-block emission limits? If you disagree, please provide details

Yes, BT agrees with Ofcom's proposals to reintroduce transitional out-of-band and out-of-block emission limits.

Question 5: Do you have any further comments on the technical assessment carried out by Ofcom in Annex 1 of this document

We note Ofcom's assessment of the various risks of interference, particularly to DTT reception, due to higher power 800 MHz transmissions. We agree that based on experience to date the number of DTT viewers that may be impacted and require mitigation measures is very small. We further note that newer TV's should have improved receiver performance since 2013 when the 800 MHz was first started to be deployed, reflecting the fact that the 800 MHz band has been harmonised for mobile for many years now.

Question 6: Do you agree with Ofcom's assessment on whether to change the emissions limits of the Spectrum Access 800 MHz licences? If you disagree, please provide further information.

Yes, BT agrees with Ofcom's assessment of whether to change the emission limits of the Spectrum Access 800 MHz licences.

