

Your response

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Question 1: Do you have any views on the additional option we outline to change the frequencies permitted under the 3.9 GHz licence from 3925-4009 MHz to 3800-3884 MHz?	<p>Scot-Tel-Gould (STG) does not support Ofcom's proposal to amend the permitted frequencies under the 3.9 GHz licence from 3925-4009 MHz to 3800-3884 MHz, as this change would restrict access to the 3.8-4.2 GHz Shared Access band.</p> <p>At present, there is limited availability of Fixed Wireless Access (FWA) equipment capable of operating within the 3.9-4.2 GHz range. Reducing the usable spectrum in the lower portion of the band would further limit deployment options for FWA services, creating additional challenges for operators relying on the Shared Access framework.</p>
Question 2: Do you have any comments on our proposed 18-month transition period for Shared Access users?	<p>An 18-month transition period is unrealistic for Shared Access users to adapt to the proposed spectrum changes. Given the potential disruption to existing operations and the limited availability of FWA equipment capable of operating within the 3.9-4.2 GHz range, this timeframe is too short and does not adequately account for the complexities of spectrum reallocation.</p> <p>A transition period of at least 48 months would provide a more realistic and equitable timeframe, ensuring a smoother migration while maintaining service continuity and fair competition. We urge Ofcom to reassess this deadline and work closely with stakeholders to develop a practical and fair transition strategy.</p>
Question 3: Do you have any comments on our proposed approach to protecting Fixed Links and Satellite Earth Stations in 3800-3884 MHz?	STG does not have any specific comments on this matter as we are unaware of any such overlaps with our operation in the Aberdeenshire area.
Question 4: Do you have any other comments for us to consider in relation to the topics raised?	Confidential
Question 5: Do you have any comments on our impact assessment?	STG has reviewed Ofcom's impact assessment and has several concerns regarding its assumptions and conclusions. While we acknowledge Ofcom's efforts to assess the potential effects of its proposals, we believe that certain key factors have not been ade-

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	<p>quately considered, particularly regarding the impact on Shared Access Licence (SAL) users and the broader implications for spectrum sharing and competition.</p> <p>The assessment does not fully account for the operational and financial burden placed on SAL users due to the spectrum reallocation.</p> <p>Many existing SAL users rely on the 3.8-4.2 GHz range for Fixed Wireless Access (FWA) and the assumption that SAL users can simply migrate to alternative spectrum does not reflect real-world constraints, particularly given limited equipment availability for the 3.9-4.2 GHz range.</p> <p>We believe that the risk of service termination to hundreds of public and business customers as a result of this implementation should be highlighted in this consultation process.</p> <p>The assessment fails to acknowledge that the proposed changes favour large incumbent operators while placing smaller SAL users at a disadvantage.</p> <p>We believe that the approach should recognise and support small SAL users, such as STG, who have made business decisions based on the expectation that their deployed equipment would have an operational lifespan of at least 15 years. We are well along this path, with many satisfied customers relying on these long-term commitments. We would also highlight that this service is only deployed by STG in Aberdeenshire and Moray in areas of low populations and hence can an exception be granted to this area to avoid a financial commitment that has not been factored in to current customer charges.</p> <p>We believe the proposed 18-month transition period is too short and does not reflect the practical challenges involved in migrating to new frequencies or acquiring new equipment.</p> <p>STG maintains that a minimum transition period of 48 months would be essential to ensure a smoother, fairer, and more technically feasible transition. If this cannot be achieved, it would at the very least provide our customers with a reasonable notice period should termination become unavoidable.</p> <p>To facilitate compliance, we would be willing to consider undertaking the necessary hardware upgrades, provided funding is available to cover the cost of replacement equipment. However, this would place a significant financial strain on STG, particularly in terms of resourcing the equipment exchange at each hilltop and customer site. We therefore urge Ofcom or the direct beneficiary of any implementation to consider supporting us in this process.</p>

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	<p>Finally, we need clarity on whether it is necessary for us to vacate this spectrum as a result of the proposed implementation. Such a move would present considerable financial and technical challenges, and we are committed to avoiding customer disconnection and service terminations at all costs.</p>
<p>Question 6: Do you have any comments on our equality impact assessment?</p>	<p>STG does not have any specific comments on this matter</p>
<p>Question 7: Do you have any comments on our Welsh language impact assessment?</p>	<p>STG does not have any specific comments on this matter</p>