

By email: TV.WhiteSpaces@ofcom.org.uk

13th December 2013

Dear Sir

Scottish Government Response to Ofcom Consultation: TV white spaces: approach to coexistence

*Scotland's Digital Future: Infrastructure Action Plan*¹ outlines the Scottish Government's commitment to a future-proofed infrastructure that will deliver world-class digital connectivity across the whole of Scotland by 2020. This underpins an ambition for Scotland to become a world-class digital nation and requires that people living, working and visiting Scotland can communicate and connect instantly using any device, anywhere, anytime. Our 2020 vision for digital connectivity is set out in high level terms at www.scotlandsdigitaldialogue.org.

We firmly recognise that the growth of wireless and mobile services and associated technology development will be an integral part of realisation of this vision, and that such growth will be dependent on future availability of spectrum. With current scarcity of spectrum resources, we commend Ofcom and the UK Government on its current work to put in place a comprehensive plan to manage spectrum resources over the next ten years. As part of this work, we highlight to Ofcom the importance of ensuring sufficient spectrum for future mobile and wireless demands. Part of such an approach, of course, is ensuring that those spectrum bands which are currently under-utilised are used for maximum impact.

We believe that television "white spaces" offer particularly significant opportunities for wireless broadband coverage in Scotland, as has been successfully demonstrated in trials on the Isle of Bute and in Annan. Being in low frequency spectrum bands, these frequencies have favourable propagation characteristics that could allow wireless broadband coverage to be provided over large areas with fewer cells (compared to higher frequency bands), therefore with potentially reduced network infrastructure costs. In addition, when used for the macro network, these frequencies could allow for reliable outdoor and indoor coverage as these frequency ranges also offer favourable building penetration of radio signals.

¹ <http://www.scotland.gov.uk/Publications/2012/01/1487/0>

The Scottish Government would welcome greater clarity on how modelling data has been used by Ofcom to establish how and the strength at which any white space device can transmit before it starts to interfere with Digital Terrestrial Television (DTT). It would be extremely helpful to have greater transparency on how DTT predictions are calculated, as this modelling will ultimately determine how Ofcom will establish white space availability.

I hope this response is useful and we would welcome the opportunity to discuss these issues in more detail with Ofcom.

Yours faithfully

Barry James Ashcroft
Spectrum Manager