

## **Consultation on the Authorisation of Earth Stations on Mobile Platforms**

I am writing in regard to the consultation on Ofcom's proposal to introduce a regulatory framework that permits the use of ESOMPs to provide broadband connectivity to passengers on-board moving vehicles including aircraft, ships and trains. I understand Ofcom intends – subject to the responses from stakeholders to this consultation – to make licensing for aircraft and ship mounted ESOMPs early in 2014.

I serve as Senior Vice President and Managing Director, UK Enterprise at travel and expense technology company Concur. The company – founded in 1993 – provides integrated expense management and travel booking services that are designed to make the lives of business travellers – particularly 'road warriors' who spend weeks at a time away from friends and family - quicker, easier, smoother and safer. Our mission is creating a global travel technology ecosystem that strips away the complexity, inconvenience and frustration that can often cloud a business trip. We call this vision 'The Perfect Trip'.

As a business, we have demonstrated our commitment to making this a reality in a number of different ways. Firstly, our own range of innovative products allow business travellers to manage their itinerary, book travel, amend travel, submit and approve expenses via their mobile device. Secondly, our T&E cloud allows third party app developers – like TaxiMagic – to offer new, useful services to our customer base. Finally, through our Perfect Trip Fund we are investing in businesses, like free text travel search company Evature, that are enhancing the lives of business travellers.

One of the missing pieces of jigsaw though is the availability of high-speed internet access on planes and trains. Without it, business travellers are unable to use these value-added services while they are on the move. Despite travel technology companies like Concur working hard to offer these services via smartphone, tablet and laptop, the absence of connectivity means a business traveller has to wait until he's waiting for his luggage before he can fully utilise them. In short, this is a big issue for the traveller, and – candidly – an important moment for the future of travel technology.

According to a survey conducted by YouGov, commissioned by Concur last year, over three quarters (77 per cent) of business travellers complain about 'unproductive moments' while on the move. Further, over a third (39 per cent) of people that travel for business regularly are not using mobile apps to make their journey quicker and easier. We believe the lack of high speed internet access on most commercial flights and train journeys is a big contributing factor. As such, we strongly support Ofcom's proposal to license the proposed ESOMPs as soon as possible.

This is about much more than technology. As one of the industry's leading tech companies – named by Forbes as the [‘world’s most innovative growth company’](#) in 2012 - we believe the more invisible technology is, the better. Rather, this is about the customer we serve: the business traveller. Using an app like GateGuru to get the quickest route through a terminal if you’re running for a transfer, using BA’s app to check the status of your connecting flight while on-board another plane, ordering a taxi with TaxiMagic before you hit the back of the queue at JFK. These services can be the difference between getting home at the weekend, and not. Between arriving ready to close a deal, and not.

In conclusion, we fully support the proposed regulatory framework – subject to it meeting recommended safety requirements - and urge Ofcom to support the UK’s army of business travellers by licensing the ESOMP. If you would benefit from additional insight from me, or would be interested in reviewing our YouGov data referenced above, I would be happy to oblige. My contact details are below.

Yours sincerely,

Michael Montenegro

Former Vice President and Managing Director at Entertainment City UK

07700 123456 (07700 123456)