

Steve Jones
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28th March 2013

Dear Steve,

Consultation on 870-876MHz paired with 915-921MHz

Telefónica welcomes this opportunity to respond to Ofcom's recent consultation. The analysis and proposals in that document reduce and potentially remove considerable residual uncertainty we have had over the potential future interference environment arising from this spectrum that is adjacent to the 900MHz mobile band.

We agree with the approach suggested by Ofcom in this consultation, which diverges significantly from that previously put forward in 2006 and 2009. In general terms we believe that the approach put forward in this consultation arrives at a much more proportionate proposal than licensing the relevant band for a single national high power user.

In particular:

- Harmonisation benefits are high : we are always supportive of approaches that generate significant benefits from regional or global harmonisation. Whether that be through access to economies of scale in network equipment and devices, or through standardisation of the interference environment across (in this case) Europe. In particular, this allows Ofcom to leverage the substantial technical analysis undertaken by CEPT when arriving at its proposals.
- Enabling higher value uses possible from shared spectrum, such as home access networks (HANS)
- Future co-existence with ER-GSM is addressed : we note that the approach allows future use of ER-GSM. However, we also note that Ofcom is not making any proposals in this regard.
- Co-existence with Telefónica's GSM900 and UMTS900 deployments : in our responses to the 2009 and 2006 consultations we highlighted the considerable concerns we had about potential out of band interference into our spectrum from high power use in this band.

Ofcom's proposals to make this band available for shared low power use substantially reduce these interference risks.

Our residual concern relates to ensuring that the actual interference impact of SRDs into G900/U900 continues to be monitored. If SRD deployment is much more prevalent than assumed by the ECC studies¹ then adjacent users may require additional protection from, or compensation for, the negative impact of out of band emissions from SRDs. We would be grateful if Ofcom could confirm what monitoring / study activities it plans to undertake to assess the interference impact of SRD deployments going forward.

Yours sincerely

Nicholas Blades
Head of Spectrum Strategy

¹ §3.12