

Title:

Mr

Forename:

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Surname:

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Additional comments:

Licencing should not be related to technology, rather move to a model of "leasing bandwidth"/spectrum for a fine time and location.

By conferring property rights to use of spectrum, the operators will look to maximise usage of this "scarce" resource.

By giving a finite time, the industry will have a natural evolution path as companies will need to either buy spectrum again after expiration of the leasehold or another more efficient buyer can buy it.

Provision of services should work on the basis of the government providing a subsidy/ buy service for remote areas. (ie similar to a feed in tariff in renewable energy). This would be the natural way to prime areas where there is insufficient demand

Question 4.1: Do you agree with our assessment of the competition concerns relating to national wholesale competition that could arise if the auction took place with no measures to promote competition? Please state your reasons for your views.:

True completion and innovation can only come by attracting new entrants into the market. The telco market is by its nature prone to "group thing" which reduces completion

Question 4.2: Do you agree that option 4 should be adopted to promote national wholesale competition? Please state the reasons for your views.:

Better to work on the basis of a leasehold.

Two elements. Acquire lease and pay a rent. Allow trading of spectrum between operators

Rent may be fixed in low demand markets and turnover based in high demand markets

Question 4.3: Do you agree that the portfolios in group 2 (middle portfolios) of option 4 are likely to be most appropriate and proportionate implementation of this option?:

Question 4.4: Do you believe that geographically split licences for a particular block of 2.6 GHz spectrum between standard power use and lower power use is likely to create significant additional benefits for consumers?:

Yes

Question 4.5: Please provide your views including the reasons for them on which options you believe should be taken in relation to promoting low power shared use of 2.6 GHz spectrum. :

Government retains a portion and rents it out on an adhoc basis as new technologies become available

Question 5.1: Do you have any comments on the proposal to include a coverage obligation in at least one of the 800 MHz licences, and the proposed extent of such a coverage obligation?:

See earlier comments

Question 5.2: Do you have any comments on which of the two approaches proposed for the specification of such an obligation would be preferable: Approach A, which would require the licensee to provide a 4G mobile data service to an area within which at least 98% of the UK population lives:

See earlier comments

Question 5.3: Do you have any comments on our assessment that it is unlikely to be proportionate to impose such a coverage obligation on more than one licensee?:

Subsidy where government acts as a customer is better than imposing universal coverage responsibilities on operator.

Question 5.4: Do you have any views on the costs and benefits of a wholesale access obligation on the licensee with the coverage obligation in respect to those areas beyond existing 2G mobile voice coverage?:

Recycle bandwidth so there is no separation between data and voice

Question 5.5: Do you have any comments on the possibility that we may in certain limited circumstances consider granting concurrent licences as set out in paragraphs 5.88 to 5.93?:

Question 6.1: Do you agree with our revised proposals for the packaging of the 800 MHz band? Please state the reasons for your preference.:

Question 6.2: Do you agree with our revised proposals for the packaging of the 2.6 GHz band? Please state the reasons for your views.:

Question 7.1: Do you agree with our revised proposals for the number of eligibility points that should attach to each lot? Please state the reasons for your views.:

Question 7.2: Do you have any comments on the proposed auction rules as explained in section 7, Annex 11 and Annex 12? Please state the reasons for your views.:

Yes, see our revised proposal

Question 8.1: Do you have any comments on the Additional Spectrum Methodology as one of several sources of information for estimating the full market value of spectrum?:

Question 8.2: Do you have any comments on our updated thinking on estimating full market value for the purpose of revising ALF as set out in this section and Annex 13?:

Question A7.1: We would welcome comments on any aspect of the data, assumptions and modelling methodology we have used in our technical analysis, in particular our approach to serving users in a range of both easier and harder to serve locations.:

Question A7.2: We would welcome any additional information, in particular from current operators, on the choice of parameters making up our ?Min var and ?Max var? cases.:

Question A8.1: Do you agree with our assessment of when Everything Everywhere, Vodafone and Telefónica are likely to be able to refarm their existing 2G spectrum? In particular, do you agree with our views on the importance of user devices and the likely availability and take-up of devices that use different technologies and bands? Please state the reasons for your views, including if appropriate your views on handset roadmaps and the practical constraints which apply to those roadmaps.:

Yes