

Title:

Mr

Forename:

Kenneth

Surname:

MacArthur

Representing:

Self

Organisation (if applicable):

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Comments:

The consultation makes several references to "UK citizens". This is very loose language, as presumably Ofcom is interested in all UK residents, not just those who have UK citizenship.

Question 2.1: Do you agree with our principles for mobile regulation?:

Question 3.1: Are there any additional sector trends that we should consider in our analysis?:

Question 3.2: Have we identified the right regulatory challenges?:

Question 4.1: We have outlined a number of factors which may affect the future market structure, including network sharing, spectrum and potential consolidation. Do you agree with this assessment, including risks and benefits that we have outlined?:

Question 4.2: you see any risks to competition that we have not highlighted?:

Question 4.3: Do you agree that a market review in the mobile sector (other than in the call termination market) is not currently required?:

Question 4.4: We have concluded that competition in the mobile sector is currently addressing access concerns adequately. Do you agree?:

Question 5.1: Do you agree with our assessment of investment in the UK mobile market and our priorities to secure future efficient investment?:

Question 6.1: Ofcom considers that regulatory intervention to protect and empower consumers continues to be needed in the mobile sector and that competition alone is not necessarily sufficient to secure this. Do you agree?:

Question 6.2: We believe that the approach we take to consumer protection and empowerment in the mobile sector strikes the right balance between taking timely action when necessary, and the need to apply regulation only when effective and proportionate. Do you agree?:

Question 6.3: Are there any areas relating to mobile services that Ofcom is not currently addressing but which it needs to address in order to achieve its consumer policy objectives? Are there other areas where regulation could be scaled back? :

Question 8.1: Do you agree that our proposed facilitation role around mobile not-spot issues is a realistic and sensible thing to do?:

Yes, but I would like to see proposed metrics against which your progress can be measured and judged.

"Facilitation" on its own sounds very woolly and without concrete KPIs it will be very hard to determine whether anyone has actually achieved anything very much.

Question 8.2: Do you agree with our general approach set out in the table above? Are there are any other actions we should take and why?:

There is a conspicuous absence of any discussion about legally-binding required levels of population coverage.

Whilst it may be tempting to leave the market to determine the right level of coverage, and whilst this may indeed work satisfactorily for the UK as a whole, it does not work for

Scotland and Wales in particular, and therefore some regulatory intervention is clearly required.

PTS in Sweden has used legally-binding population coverage requirements with great success, and, if they are applied to all operators, there is no distortion of the level playing field.

Question 9.1: Are there any additional issues about mobile content and accessing content via mobile that should be considered?: