



Qualcomm welcomes the opportunity to respond to Ofcom further consultation on the application of liberalisation and trading to the mobile sector. Qualcomm strongly supports the refarming of the 900 MHz and 1800 MHz bands as soon as possible in 2009. An expedited liberalisation of the 900 MHz will bring significant benefits to UK consumers and citizens in terms of enhanced and more widely available mobile broadband services. In particular, UMTS900 will enable the expansion of broadband to rural areas and smaller towns and communities in a cost-efficient manner, with the resulting impact on productivity and employment. It will also enable the indoor coverage of 3G services to be improved.

The UK market has witnessed a dramatic increase in 3G usage over the 12 months following the previous Ofcom consultation on the liberalisation of the 900 MHz and 1800 MHz held late September 2007 (100% year on year 3G total volume growth, 80 % year on year 3G handset volume growth, 2900 % year on year 3G dongle volume growth). The availability of UMTS900 devices has also rapidly improved in the past year. GSA's recent HSPA Devices Survey (March 10, 2009) confirmed 115 HSPA devices supporting operation in the 900 MHz band had been launched (compared with 20 devices by mid-2008) by more than 11 different suppliers.

Qualcomm therefore applauds Ofcom's initiative to accelerate the liberalisation of the 900 MHz and 1800 MHz bands by removing the GSM restriction which currently applies to these bands, in order to allow their use, in the first instance, by UMTS which has been proven to be spectrally compatible with GSM by CEPT. This approach is in line with the Wireless Radio Spectrum Modernisation Programme specified by the Government in its Digital Britain Interim Report, which called for a quick resolution of "the future of existing 2G radio spectrum through a structured framework, allowing existing operators to re-align their existing holdings, re-use the spectrum and start the move to next generation mobile services".

Ofcom initiative will also enable the UK to comply in a timely manner with the obligations set by the Directive¹ amending the GSM Directive and which requires Member States to "make available the 880-915 MHz and 925-960 MHz radio spectrum bands (*the 900 MHz band*) for GSM systems and for UMTS systems ..." ²and to "bring into force the laws, regulations and administrative provisions necessary to comply with this Directive within six months after the date of entry into force of this Directive ..." ³. This amended GSM Directive will be adopted by the European Parliament and Council at the latest in June 2009 after a political agreement on a first reading agreement was reached at the Trialogue of the 24th of March 2009, the endorsement by the COREPER on the 27th of March and the vote by the ITRE Committee of the European Parliament on the 21st April.

Qualcomm supports an industry agreed solution for the liberalisation of the 900 MHz and 1800 MHz bands which would be based on a win-win approach for existing operators while allowing the launch of UMTS900 without any further delays. In this sense, Qualcomm is pleased to see that some of Ofcom's current

¹ DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Council Directive 87/372/EEC on the frequency bands to be reserved for the coordinated introduction of public pan-European cellular digital land-based mobile communications in the Community

² Article 1

³ Article 2



proposals are in line with the views put forward by Qualcomm in its response to the previous consultation on the application of liberalisation and trading to the mobile sector:

- Remove the technology restriction in the 900 MHz band and allow the incumbent operators to use their spectrum to deploy UMTS900 from the start of the liberalisation process without any delay,
- Retain 2 x 15 MHz per incumbent operator as this would ease the introduction of UMTS900 in major conurbation in an efficient manner during the transition phase from the existing spectrum assignments towards a future agreed target band plan.

UMTS/HSPA, including in the 900 MHz, will continue to evolve towards enhanced performances and higher data rates, enabling richer mobile broadband services and supporting all market segments (Enterprise, Consumer, Fixed/Mobile/Nomadic) and device segments (handsets and PC cards, consumers electronics, Ultra Mobile Devices ...). HSPA+ is a strong and natural evolution path for UMTS:

