Question 1: This executive summary sets out our proposals for the Digital Dividend Cleared Award. Do you agree with these proposals?:

Intel response:

§§ 1.1-1.4: No comment

§§ 1.5-1.7 ?Our objective?: Intel agrees with and supports

§§ 1.8-1.12 ?The cleared spectrum?: The huge amount of released spectrum (128 MHz) and early availability (2012) are advantageous for mobile industry. Unfortunately the cleared spectrum does not coincide with WRC-07 decision which identified 790-862 MHz as mobiles (and IMT) spectrum in Region 1.

§§ 1.13-1.18 ?Timing of the award?: We welcome the planned fast course of matters and Ofcom?s attitude that that the market is better placed than the regulator to decide the use of spectrum. Similar like Ofcom we also support a non-mandatory approach to harmonising the digital dividend in the EU which would not favour one use of the digital dividend over others.

In the CEPT Report 22 (so called Report B) ?Technical Feasibility of Harmonising a Sub-band of Bands IV and V for Fixed/Mobile Applications (including uplinks), minimising the Impact on GE06? from CEPT to the European Commission in response to the Mandate on ?Technical considerations regarding harmonisation options for the Digital Dividend? approved on 6 July 2007 by the Electronic Communications Committee (ECC) within the European Conference of Postal and Telecommunications Administrations (CEPT) the impact of spectrum harmonisation on economic of scale is considered.

The §2.3 of Report B report informs that:

?industry stakeholders have shown significant interest in the available UHF spectrum for mobile communication services, but this interest is dependent on a number of factors, including the harmonisation of this spectrum for mobile communication use in Europe and the related issue of economies of scale in handsets?

Therefore, adequate consideration should be given to the European and worldwide situation with regards to the harmonised spectrum used for mobile services in order to ensure that this spectrum is available in the largest possible addressable market which would then drive costs down.

Intel welcomes Ofcom plan to observe the outcome of discussions in the European Parliament and Council where the issue of the Digital Dividend is currently being addressed and to keep these developments under review

§§ 1.19 ?detailed proposals?: will be commented individually question by question

§§ 1.20-1.23: No comment

Question 2: Do you agree with our proposal to include the interleaved spectrum in channels 61 and 62 in the cleared award?:

Intel response:

Intel agrees with Ofcom proposal to include the interleaved spectrum in channels 61 and 62 in the cleared award.

It would support European spectrum harmonisation and allow usage of the whole WRC-07 spectrum in many regions of UK.

According to Report B, ?the key issue going forward for Ofcom will be to specify how to include licence conditions for new services that will guarantee protection of these DTT (digital terrestrial television) service coverage obligations. Any new service will have to operate in such a manner which does not impact on the PSB (public service broadcasters) coverage obligations and with minimal impact on the eventual 6 Multiplex coverage. Ofcom would expect that these would be achieved by careful planning (use of protection ratios, selection of appropriate power levels and channels)?.

Intel is aware that releasing of spectrum as interleaved may decrease it value for some bidders but when following the logic of Report B the harmonised spectrum has mach higher value then the spectrum burdened with some mitigation obligations.

Intel agrees with Ofcom position that ?channel 69 in isolation is of limited value to PMSE users because touring companies, who generally use channel 69, also require access to channels 67 and 68? and also because channel 69 belongs to DD spectrum 790-862 MHz being considered by CEPT for pan European harmonisation.

Therefore Intel welcomes Ofcom?s proposal ?to enter into discussions with the PMSE stakeholders to identify whether there is alternative spectrum, comparable in quality and quantity that could be used in place of channel 69 that may offer a superior long-term solution for PMSE needs?.

For example PMSE applications could be placed in lower part of cleared spectrum, i.e. in channels 31-40 and PMSE applications should be moved there at the point of time when the DD spectrum 790-862 MHz starts to be used for mobile services in Europe.

Question 3: Do you agree with our proposal not to allow licence-exempt use of channels 61 and 62 by cognitive devices?:

Intel response:

Following Ofcom?s argumentation contained in the § 4.41 and § 4.42 of the consultation document and the CEPT Report 24 (so called Report C) ?A preliminary assessment of the feasibility of fitting new/future applications/services into non-harmonised spectrum of the digital dividend (namely the so-called "white spaces" between allotments)? from CEPT to the European Commission in response to the Mandate on ?Technical considerations regarding harmonisation options for the Digital Dividend? approved on 27 June 2008 by the Electronic Communications Committee (ECC) within the European Conference of Postal and Telecommunications Administrations (CEPT), Intel agrees with Ofcom proposal not to allow license-exempt use of channels 61 and 62 by cognitive devices.

However Intel would very welcome if Ofcom carefully observes CR (cognitive radio) technological progress and permits CR operation soon after CR have achieved technological maturity.

Question 4: Do you have any comments on our assessment of the most likely uses of the cleared spectrum and the amount of spectrum required for these services? Are there any other potential uses that we should consider?:

Intel response:

Channels 61-69 offer the opportunity for Europe wide harmonization of mobile communication and multimedia services. Therefore the assessment of uses should be coordinated with Europe as discussed in Section 3 ?Legal framework? of this consultation document.

As discussed in the Report C, PMSE became a key to production of multimedia content. Therefore sufficient amount of Europe wide aligned spectrum should be made available for PMSE.

We are aware that country wide introduction of HD DTT (high definition digital terrestrial television) will require some refarming in the transition phase. Therefore the channels 31-40 could be used primarily for HD DTT.

Question 5: Do you agree that we should proceed with our current timetable, with a view to holding the cleared award in summer 2009?:

Intel response:

Intel welcomes with Ofcom?s fast track approach to release DD spectrum and accepts any adoption of this plan according to the UK needs.

Question 6: Do you have any views on the appropriate notice period for temporary PMSE access to channels 63-68, and/or on whether or not extend temporary access to channels 31-40?:

Intel response:

Channels 63-68 belong to the DD spectrum 790-862 MHz and no exceptions should be made when setting them free for mobile use in course of European harmonisation.

As Ofcom discussed in the §4.34 the alternative spectrum for PMSE should be found to ?offer a superior long-term solution for PMSE needs?. Such spectrum could be the channels 31-40.

Question 7: What are your views on deferring the start date for rights to use cleared spectrum in London to help meet the need for wireless

microphones and other audio links for the London 2012 Olympic Games and Paralympic Games?:

Intel response:

No comment

Question 8: Do you agree with the use of SURs as the approach for defining consistent TLCs for this award?:

Intel response:

Following Ofcom argumentation, Intel is of the opinion that TLCs (Technical License Conditions) basing on SURs (Spectrum Usage Rights) are a good compromise for coexistence of different technologies and services in the UHF band and therefore for application of technology and service neutrality (TN and SN) principles when ensuring effective spectrum usage.

Question 9: Do you have any comments on the SUR parameters listed in Tables 5.1 to 5.5 and the assumptions used to derive them?:

Intel response:

No comment

Question 10: Do you agree with our proposals for managing interference between new services in the DDR cleared spectrum?:

Intel response:

When using spectrum arrangements in channels 61-69 inclusive reverse duplex like proposed in CEPT Report 23 (Complementary Report to Report B (CEPT Report 22), so called Report B complement) ?Technical Options for the Use of a Harmonised Sub-Band in the Band 470 - 862 MHz for Fixed/Mobile Application (including Uplinks) from CEPT to the European Commission in response to the Mandate on ?Technical considerations regarding harmonisation options for the Digital Dividend? (approved on 21 December 2007 by the Electronic Communications Committee (ECC) within the European Conference of Postal and Telecommunications Administrations (CEPT)) then practically no guard band at 790 MHz frequency would be necessary between mobile services and DTT.

Intel does not expect that UMTS systems will be implemented in the cleared spectrum but modern OFDM based systems.

Generally, Intel believes that further study will be required as the characteristics of mobile broadband systems in these frequencies become more mature and stable.

Question 11: Do you agree that the most efficient and effective means of preventing interference to the existing DTT services is by the addition

of a protection clause to licences in the cleared spectrum? If not, what alternative approach would you suggest?:

Intel response:

No comment

Question 12: Do you agree that the best way to finalise the protection clause approach and to address the practical implementation issues is through direct engagement with interested stakeholders? With which stakeholders should we engage?:

Intel response:

No comment

Question 13: What do you believe would be the implications of protecting indoor/set-top antennas? Should a distinction be drawn between set-top antennas and larger antennas designed for external reception of TV signals that are loft-mounted?:

Intel response:

No comment

Question 14: Do you agree with our proposals for managing interference between new and existing users?:

Intel response:

No comment

Question 15: Do you agree with the proposed propagation models and databases to be used for compliance assessment?:

Intel response:

No comment

Question 16: Do you have any comments on the transmit masks set out in paras 5.128 to 5.130?:

Intel response:

Intel believes that the characteristics of mobile broadband system remain under consideration:

The values presented in §5.131 and §5.132 make an impression of assuming that

UMTS equipment will be implemented in the cleared spectrum which is quite uncertain.

For OFDM based systems these values may differ and therefore should be also considered and possibly adopted.

Question 17: Do you agree that where the cleared spectrum is used for the operation of a DTT multiplex, we should replicate the ownership restrictions from the Broadcasting Act regime relating to (a) local authorities, (b) political bodies, (c) religious bodies and (d) bodies exerting undue influence but not replicate restrictions relating to (e) broadcasting bodies and (f) advertising agencies?:

Intel response:

No comment

Question 18: Do you agree that we should facilitate interoperability between existing DTT multiplex operators and new operators using cleared spectrum?:

Intel response:

Intel agrees with Ofcom argumentation presented in §§6.26-6.30 that under given circumstances the proposed facilitation of interoperability like resumed in §6.30 offers a best compromise between free market play and ensuring best achievable benefits to citizens and consumers.

Question 19: We welcome views on the relative merits of such an approach to information provision, in particular concerning the type of information that may be helpful and any impacts that publication of information might have both on licence holders and the wider spectrum market.:

Intel response:

Intel welcomes technology and service neutral licensing conditions as well as other conditions as discussed in §§6.31-6.66 and resumed in §6.67.

Question 20: Do you agree that the cleared award should include both 8 MHz lots for DVB-T and MMS TLCs and 5 MHz lots for FDD and TDD TLCs across the band?:

Intel response:

The cleared spectrum in UK offers the comfort of two parts:

- 1) channels 31-40 and
- 2) channels 61-68 (possibly including channel 69, see also Intel response to Question

In the spectrum of type 1) 8 MHz channels could be implemented to ensure TV like services.

In the spectrum of type 2) 5 MHz channels could be implemented to harmonize with pan European arrangements and to anticipate that mobile broadband services will deploy 5MHz or 10 MHz wide channels.

Such approach would help to solve a lot of coexistence issue, would save spectrum by avoiding of most guard bands and would also ensure achieving of economics of scale.

Question 21: Do you agree that the cleared award requires a mixture of frequency-specific and frequency-generic lots to be offered in the auction?:

Intel response:

No comment

Question 22:Do you agree with the proposed outline definition of lots suitable for MMS, DVB-T, TDD and FDD applications?:

Intel response:

Intel is of the opinion that the most realistic spectrum arrangement plan for the upper sub-band (channels 61-68) is presented in the §§7.67-7.69 and illustrated by figure 7.5. Channel 69 should be added to this plan.

Other spectrum arrangement discussed in §§7.24-7.79 (?Frequency specificity of lots?) are very UK specific and not subject to further Intel comments.

Question 23:Should the flexibility to bid for lots defined on both fixed and variable-frequency rasters be preserved in the auction? If not, which are preferred?:

Intel response:

No comment

Question 24: Do you agree with the proposed basis for awarding Channel 38 as a distinct lot in the auction?:

Intel response:

Channel 38 being currently used by radio astronomy and planned to be cleared in 2012 could be used for low power PMSE applications and also auctioned as distinct lot. This approach could be a starting point for sorting best solutions for spectrum arrangements out of multiple and complex possibilities discussed in §§7.86-7.103.

2)

Question 25: Do you agree with the proposed structure of frequency rules for allocating different licence types in the auction? Are there any amendments that would improve the efficiency of spectrum allocation via an auction?:

Intel response:

In the §§7.86-7.103 Ofcom considers different variants of band plans possible in the lower and upper sub-band of cleared spectrum, channels 31-40 and channels 61-69 respectively.

In the §7.94 Ofcom recognises that ?These examples illustrate that there are a very large number of such permutations across the whole of the available spectrum.?

In the same paragraph Ofcom deliberates that ?be for us to pre-define a much smaller number of band-plans which are allowed, and to develop auction rules which specified in advance that lots would always be constituents of one of these band-plans as an outcome of the award. Such rules would need to reflect those band-plans that were considered most likely to emerge, in consultation with stakeholders.?

Intel vigorously supports free play of market forces when introducing new technologies. When considering spectrum arrangements some guidance would be advantageous for the markets. Therefore Intel welcomes the Ofcom?s approach to agree with the stakeholders on best suitable spectrum arrangements before the auction and to design auction rules appropriately because as Ofcom states in §7.95 ?to support all the theoretically possible outcomes in the award, is either feasible or desirable from a bidder perspective?.

Another idea worth closer investigation is presented in §7.97 to split the award of the cleared spectrum into more than one smaller award like offering separate awards for lower and upper sub-bands.

This idea is worth to be considered especially in conjunction with the case discussed in §§7.67-7.79 which is a working assumption that features of the harmonised European band planning work that has so far been undertaken in CEPT for the upper sub-band.

As stated in §7.92, ?a large number of potential band-plan outcomes could arise from the award of the spectrum, depending upon a range of considerations such as:

- Number of paired versus unpaired channels defined for award
- Symmetric versus asymmetric bandwidth services
- The degree of alignment with harmonised European band-plans
- Duplex spacing
- Guard-band separation of uplink and downlink channels?.

Separate awarding of lower and upper sub-bands would foster European harmonisation of mobile spectrum, simplify the auctions rules and give clear guidance to the mobile industry.

Intel is not of the opinion that solutions like provision of a UK-wide multiplex using

DVB-T technology in a MFN (multi frequency network) which may require spectrum from both the upper and lower sub-bands would be more valuable in terms of spectrum prices then awarding of spectrum with clear premise to harmonise the upper sub-band with Europe for mobile service.

Regarding §7.100 Intel is of the opinion that if Ofcom undertakes a lot of effort to clear the DD spectrum then it should be possible in course of time to clear also the channels 61 and 62 to made these channels fully available to mobile service. Similarly Intel would welcomed channel 69 fully integrated into spectrum assigned to mobile service.

Question 26: Do you agree with our proposal to proceed on the basis of UK-wide lots?:

Intel response:

Intel welcomes Ofcom?s favouring of UK-wide lots.

Question 27: Do you favour including the available cleared spectrum in (a) Guernsey and (b) Jersey in the geographic coverage of the licences to be awarded? If not, what approach do you favour instead?:

Intel response:

Intel response to Question 25 generally applies also to Question 27.

Question 28: Do you agree that the combinatorial clock auction is the most suitable auction design for the cleared DDR award?:

Intel response:

No comment

Question 29: What potential simplifications, if any, could be made to the proposed lot structure for DVB-T, MMS, TDD and FDD lot categories which would still reflect the most important differences in value between lots?:

Intel response:

Intel welcomes Ofcom approach to simplify the auction like proposed in §8.48. As indicated in the response to Question 25, Intel sees significant potential for simplification of procedures.

For example:

- distinguishing between lower and upper sub-bands of cleared spectrum and associating them with TV-like and mobile services respectively

- harmonisation need with European band plans like discussed in the legal part of consultation document would reduce significantly number of spectrum arrangement

permutations in the upper sub-band

- also allotment of PMSE and MMS applications in the lower sub-band would further simplify the auction design

To give the industry a clear guidance and ensure investment security the lot structure should reflect not only the need of harmonisation of spectrum arrangements to maximum possible extend but also availability of radio technologies and their potential for further development in the future.

Question 30: Do you have any comments on our proposals for the Application and Qualification Stages of the combinatorial clock auction for the cleared DDR award, including our proposals for initial deposits?:

Intel response:

No comment

Question 31: Do you consider that it is important to distinguish relative weightings in advance between the eligibility points of the different 1 MHz blocks available in this award? If so should this be restricted to channels 36, 38, 61 and 62 and what do you consider these relative weightings should be?:

Intel response:

No comment

Question 32: Do you have any views on whether an ex ante eligibility points activity rule or a revealed preference activity rule should be used in this award?:

Intel response:

No comment

Question 33: Do you have any views on whether there should be restrictions on bidders? ability to bid on multiple technical licence types within single package bids or between different rounds of the auction and whether bidder association rules should potentially be adjusted to cater for any such restrictions being imposed?:

Intel response:

No comment

Question 34: Do you have any further comments on any aspect of our proposals for the Principal Stage of the combinatorial clock auction for the cleared DDR award?:

Intel response:

No comment

Question 35: Do you have any comments on any aspect of our proposals for the Assignment Stage or the Grant Stage of the combinatorial clock auction for the cleared DDR award?:

Intel response:

No comment

Question 36: Do you agree with our approach to assessing whether the award of cleared spectrum fully promotes competition and efficiency? :

Intel response:

Intel welcomes Ofcom?s extensive efforts to promote competition and efficiency when awarding cleared spectrum. Intel supports the Ofcom Spectrum Vision (?Spectrum Framework Review?, published by Ofcom on 28th June 2005), that:

1. Spectrum should be free of technology and usage constraints as far as possible. Policy constraints should only be used where they can be justified;

2. It should be simple and transparent for licence holders to change the ownership and use of spectrum; and

3. Rights of spectrum users should be clearly defined and users should feel comfortable that they will not be changed without good cause.

Question 37: Do you have particular concerns about possibilities for award outcomes to fail to fully promote competition in downstream markets or to result in inefficient use of spectrum? If so, please explain what these are and provide supporting evidence.:

Intel response:

In the ?Spectrum Framework Review?, published by Ofcom on 28th June 2005, Ofcom?s spectrum management policy is published, the advantages and disadvantages of Ofcom?s approach are analysed as well as it risks are presented, according to the table below:

1. Area of risk: Market mechanisms applied too widely

Possible effects:

- Subsequent change of use breaches international agreements.
- Increased interference results.

Mitigation:

- Ofcom will check international agreements before making licences tradable.
- Careful introduction of liberalisation to allow the interference risk to be assessed.

2. Area of risk: Market mechanisms not applied widely enough

Possible effects:

- Potential benefits of trading not fully achieved.

- Distortion of competition in the case that competing providers have differing abilities to trade.

Mitigation:

- Ofcom will make trading as widely available as possible.

- Ofcom will consider all competing users of spectrum and ensure a level playing field as far as possible.

3. Area of risk: Insufficient spectrum available for licence-exempt use

Possible effects:

- Congestion in existing spectrum, reducing benefits to users.

- Lack of innovation.

Mitigation:

- Careful and periodic monitoring of spectrum available for licence-exempt use to understand how usage is growing.

4. Area of risk: Excessive spectrum available for licence-exempt use

Possible effects:

- Spectrum unused or little used with resulting loss in potential economic value.

Mitigation:

- Release spectrum available for licence-exempt use carefully and in stages to avoid excessive supply.

5. Area of risk: Changes to harmonisation

Possible effects:

- UK moves out of line with other countries.

- Valuable services not launched because of inability to harmonise.

Mitigation:

- Monitor international harmonisation and any UK differences and evaluate whether they require corrective action.

6. Area of risk:

Market failures

Possible effects:

- Abuse of market power
- Transaction costs

Mitigation:

- Use competition powers
- Intervention to clear spectrum, overlay auctions, spectrum efficiency grants

7. Area of risk: Disruption to customers

Possible effects:

- As spectrum is traded some services may be withdrawn with subsequent disruption.

Mitigation:

- Limited action from Ofcom ? this is part of a standard market and would not normally require intervention.

Intel is of the opinion that successful managing the above listed risks would avoid inefficient use of spectrum and would promote competition in the market.

Question 38: Do you agree with our view that we should introduce a general safeguard cap aimed at promoting diversity of spectrum holdings? Do you have views concerning the level of such a cap?:

Intel response:

Spectrum cap may be a method to promote diversity of spectrum holdings. However when studying the given consultation document appears an impression of some inconsistencies in DDR as well as in handling of spectrum management risks collected in the table contained in the response to Question 37:

1. The channels 61 and 62 are interleaved; the channel 69 is assigned to PMSE. This is the risk to harmonization with the rest of Europe which may result in none launching of valuable services.

2. The issue of channels 61, 62 and 69 together with the cap of 50 MHz and necessity 2x20 MHz to provide sufficient spectrum for BB applications (see §9.61) may lead to pairing of spectrum from upper and lower sub-bands to fulfil the broadband usage needs. Other outcome could be that place for only one operator is available when fulfilling the harmonization requirement.

Therefore the spectrum caps should be studied and decided very carefully.

Question 39: Do you agree with our proposals to include an information provision licence condition to help facilitate efficient secondary trading?:

Intel response:

Intel agree with Ofcom proposals to include an information provision license condition to help facilitate efficient secondary trading because given the likely importance and scarcity of the cleared spectrum, inefficient spectrum use, even for relatively short periods of time, could impose significant costs on UK citizens and consumers.

Question 40: Do you agree with our view that we should not apply any other general remedies in the cleared award?:

Intel response:

Convergence offers a chance to accommodate many different applications on the available spectrum. For example broadcasting applications and broadband Internet could be easily offered together using a common broadband infrastructure. Broadband Internet provides access to all applications - broadcast as well as mobile telephony or data applications.

The regulatory paradigm change to service and technical flexibility with spectrum as an infrastructure asset would support innovations and legal certainty. It offers an opportunity to administrations to support the citizens and customers benefits of getting access to applications by obliging the operators to deliver wireless broadband anytime, every where.

Pros und contras of not applying of rollout obligations as well as of use it or lose it requirements should be very carefully considered especially in relation to upper subband where Europe wide harmonized mobile service is likely to be deployed.

As widely discussed last years, the access to wireless broadband is essential for economical growth and for well being of customers and citizens. It should be an objective of every administration to ensure mobile wireless infrastructure delivering sufficient broadband to enable access to every application available any time any place.

These opportunities warrant immediate consideration of how the rules of cleared spectrum award should be modified.

Question 41: Do you agree with our identification of the three areas requiring further attention?:

Intel response:

Intel agrees with Ofcom?s identification of the three areas requiring further attention:1. Mobile broadband ? availability of low frequency spectrum for mobile use;2. Pay TV ? Sky acquisition of cleared spectrum for pay services on DTT; and3. NGW/Arqiva ? acquisition of cleared spectrum for additional multiplexes on DTT.

Traditionally radio spectrum is regulated in terms of exclusive spectrum bands for exclusive services. This way of thinking is dominating also the ongoing discussion on

how to utilize the cleared spectrum.

Especially in light of Intel?s response to Question 40, Intel is of the opinion that IP based applications like IPTV will lead to significant changes in the media markets. Radio and TV broadcasters, both private (paid) and public, are in intensive and continuous process of shifting their businesses into Internet.

Therefore consideration of spectrum assignment to specific applications seems to be outdated. The future is expected to be IP based and therefore more application independent wireless bandwidth, just ?thick bit pipes? wil be required which are most effective provided by mobile broadband.

Question 42: Do you agree with our assessment that the limitations on the amount of cleared spectrum available for mobile broadband applications, and the particular advantages of sub 1GHz spectrum, could result in an outcome where there are limits on the level of competition possible in the provision of these services?:

Intel response:

In Intel?s view the limitations on the amount of cleared spectrum available for mobile broadband applications, and the particular advantages of sub 1GHz spectrum, not necessarily could result in an outcome where there are limits on the level of competition possible in the provision of these services.

When adapting telecommunication legal systems to the convergence trends, the spectrum regulatory paradigm could be changed. Instead of relying on an ?exclusive spectrum for exclusive services? paradigm, we could give licensees flexibility to define service features as long as they don?t interfere with their frequency and geographic neighbours.

The tradeoffs between frequencies, coverage, data throughput, cost etc. could be made in the marketplace.

Question 43: Do you think that a soft spectrum cap on either (a) the cleared spectrum suitable for mobile broadband applications alone, or (b) the holding of any sub 1GHz spectrum suitable for mobile broadband applications, which would trigger action if a significant competition concern emerges in relation to the market structure in the future mobile broadband market, could be an appropriate approach to these concerns?:

Intel response:

Spectrum classification like described in the Intel?s answer to Question 42 would pave the way to considering spectrum as an asset when building telecommunication infrastructure and therefore a legal separation between network infrastructure and content. Being responsible just for coverage and capacity the legally independent network operators could offer network infrastructures adapted to geographical circumstances and local infrastructure requirements. The content provider would then deliver a huge diversity of applications using the available bandwidth. As result, the market structure would evolve from vertical ?high power, high tower? towards horizontal organized, legally independent markets for network infrastructures, applications and contents.

The carefully considered spectrum caps could support these developments.

Question 44: Do you agree with our assessment that issues in the pay TV market are not at this stage primarily an issue for the cleared award?:

Intel response:

No comment

Question 45: Do you agree with our initial assessment that we should not intervene further in the cleared award to remedy any potential impact on competition resulting from the holding of cleared spectrum by NGW/Arqiva?:

Intel response:

No comment

Comments: