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By email to justin.moore@ofcom.org.uk

Dear Justin

The application of spectrum liberalisation and trading to the mobile sector consultation

The Council for National Parks (CNP) welcomes the opportunity to respond to the above consultation. CNP is the national charity which works to protect and enhance the National Parks of England and Wales and areas that merit National Park status and promote understanding and quiet enjoyment of them for the benefit of all. We confine our comments to the potential impact of the proposals on National Parks.

The need for fewer base stations in rural areas

Paragraph 1.13(a) states that "Fewer base stations need to be deployed to cover open spaces (rural areas)" and 1.13(d) estimates that "...access to 900 MHz spectrum could mean that in the order of 10,000 fewer sites need to be deployed per operator in densely populated areas compared to 2.1 GHz and in rural areas approximately 2,500 fewer".

Paragraph 1.24 clarifies that "Liberalisation reduces the number of sites that need to be built to offer high quality mobile broadband services. We estimate that deploying such services with 900 MHz spectrum is likely to significantly reduce the number of new sites needed".

CNP welcomes the proposals for spectrum liberalisation in so far as they would reduce the number of sites needed in sensitive rural environments such as National Parks.

The extension of 3G services into rural areas

We note that the proposals would enable the extension of 3G services into rural areas. Has any study been undertaken of the need for 3G services in rural areas and the extent to which the existing 2G network can be used or modified to provide 3G services? Greater clarity is needed on how many new sites might be needed to extend 3G services into rural areas so that their potential impact can be assessed properly prior to rollout. This is especially important given Ofcom's statutory duty to have regard to National Park purposes when coming to any decisions or undertaking operations that may have an impact on the National Parks. Maximum use should be made of existing equipment in any extension of 3G services to rural areas so that environmental impacts are minimised.

Please do not hesitate to contact me should you require clarification of any of the above.

Yours sincerely

Ruth Chambers

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Deputy Chief Executive

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