

Justin Moore
By email: justin.moore@ofcom.org.uk

29 November 2007

Dear Mr Moore

Ofcom Consultation – Application of spectrum liberalisation and trading to the mobile sector – Scottish Government response

Thank you for providing us with the opportunity to comment on Ofcom's proposals relating to the measures it should take to implement the Radio Spectrum Committee Decision relating to the 900 MHz and 1800 MHz bands.

The Telecoms Policy Unit within the Scottish Government welcomes the consultation and wishes to offer some comments expressing its high-level support of the overall proposals.

Our policy interest in this area partially relates to representations we on occasion receive from parties dissatisfied with the patchy coverage of both 2G and 3G services, particularly in rural areas. The Scottish Government's approach to mobile coverage is to monitor developments by liaising with the regulator as well as directly with mobile operators.

We understand that Ofcom is currently consulting on allowing some existing 2G spectrum (900 MHz) to be used for 3G services. Using the 900 MHz spectrum would improve transmission distances, thus requiring fewer masts and lowering the cost of 3G deployment. As a result, operators could gain higher revenues in rural areas and this could pave the way for improved 3G coverage in rural areas.

We are supportive of this regulatory proposal due to the potential benefits for rural mobile coverage which could materialise.

On this basis, having considered the consultation document, we are in agreement with Ofcom's preferred approach, in that Option C is the most appropriate approach for the 900 MHz spectrum and Option A for the 1800 MHz spectrum.

From a wider perspective, we are keen to hear about any other proposed regulatory changes which would result in benefits to mobile coverage in Scotland and are happy to participate in relevant discussions as appropriate.

I hope these remarks are useful.

Your sincerely

Harry Emambocus
Telecoms Policy Team