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# techUK response to Ofcom Call for Input:
## Improving consumer access to mobile services at 3.6GHz to 3.8GHz

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## Introduction

### About techUK

techUK represents the companies and technologies that are defining today the world that we will live in tomorrow. In a very real sense techUK represents the future.

At the heart of tech in the UK is an ecosystem of 270,000 companies producing digital technologies, products and services. From east to west, north and south, from enterprise class organisations to established medium-sized businesses, growing small businesses and an exciting generation of tech start-ups: the UK is a hotbed of tech talent and techUK exists to represent the sector in its entirety.

Our role as techUK is to ensure that we seize the potential for good and address the disruptive new challenges that change and innovation always present. We work to understand the opportunities that technology provides; to support the companies and innovators that can realise those opportunities.

This underpins our simple vision to ensure that tech is good for the UK, the UK is good for tech and that tech is good for people.

techUK has been facilitating the UK Spectrum Policy Forum[1] which has held a series of workshops on the 3.6-3.8GHz band:

- Oct 28th '16 3.6-3.8GHz/3.8-4.2GHz
- May 26th '17 3.8-4.2GHz with an update on 3.6-3.8GHz from Ofcom.

## Response

Consumer data demand per capita continues to increase driven by video increasingly consumed on mobile devices, so it is necessary that mobile operators continue to meet that demand.

While infrastructure investment and re-farming of existing mobile spectrum continues, it will be essential to make available additional mobile spectrum to meet capacity demands.

RSPG has identified 3.4-3.8 GHz (part of the existing satellite "C-Band") as the "primary band suitable for the introduction of 5G use in Europe before 2020". The UK Spectrum Policy Forum has held 2 workshops where 3.6 - 3.8GHz has been discussed in relation to existing FS and Satellite (FSS) use relative to opening the band up to mobile (IMT-2020) use.

If the UK is to be a leader in 5G, it is important that the 3.4 – 3.8 GHz band is made available for 5G and techUK welcomes the move by Ofcom to make the band available for this as soon as possible. techUK believes that if protection of satellite earth station reception in the band 3.6 to 3.8 GHz ceases it is important that future availability of the 3.8 – 4.2 GHz band for satellite use is confirmed and clarified by Ofcom, including suitable adjacent band protection. Support to facilitate migration of earth station assignments from 3.6 – 3.8 GHz should be explored.

[1] http://www.techuk.org/about/uk-spectrum-policy-forum

Some satellite-focussed techUK members believe that it is important to protect existing satellite earth stations, particularly large gateway sites operating in the band from undue interference given the importance of the traffic that is carried and the benefits that satellite connectivity provides to UK businesses, consumers and government.

We support Ofcom's aim to clear fixed links in this band. In this case it should identify alternative spectrum for those fixed link users. Ofcom should also work with Government to provide appropriate support particularly if this were to enable clearance ideally before 2020.

techUK considers that auctioning spectrum in the 3.4-3.6GHz band at the same time as spectrum in the 3.6-3.8GHz band would be a better approach allowing for decreased costs for all parties, increasing the certainty of outcomes (ie valuations, investor confidence, single set of auction rules, process) and potentially opening up other scenarios. This would suggest bringing forward the 3.6-3.8GHz auction to be run in parallel with the now delayed 3.4-3.6GHz auction.