

Via Sat UK

- Question 1: Do you agree that we have identified the right competition concerns?:
- Question 2: Do you agree with our assessment and provisional conclusions in respect to: Competition Concern 1 (the risk of very asymmetric spectrum shares and in particular Competition Concerns 1(i), 1(ii), and 1(iii)). Competition Concern 2 (the risk of there ceasing to be four credible MNOs? If not, please give your reasons and set out the evidence that supports your view.:
- Question 3: Do you agree we have identified the right options to address our competition concerns?:
- Question 4: Do you agree with our assessment of the options we have identified for promoting competition in the auction? If not, please describe what measures you consider would be appropriate, providing as much evidence as possible to support your preferred approach.:
- Question 5: Do you have any further comments on our proposals on competition measures?:

Not completely, ViaSat believe strongly that there is a market for smaller NON-MNO's to provide LTE services on a private basis and this will stimulate smaller, agile, organisations to be innovative in the market place, those innovations can later be adopted by the main MNO's. It is at times necessary for regulatory bodies to allow established competition to be challenged, in order to halt creeping stultification in a market place

No company is too large to fail (see Nokia and Nortel), having other organisations with access to spectrum will help ensure the market has new life blood and new ideas to continually evolve service offerings

Whilst end users are expecting access to more services, faster services and without boundaries, UK competition is currently stifled, 4 main MNO's and a handful of MVNO's (who have to play nicely to get access to customers) in a saturated market is unlikely to lead to innovation, in the current economic climate MNO's are "entrenching" to protect margins at the expense of growth and innovation

A portion of the spectrum (10% would suffice) to be allocated to NON-MNO's and NON-MVNO's will create an opportunity for entrepreneurial companies to find new areas of value

Truly open competition is very difficult to achieve without some form of control, having a small number of wealthy MNO's sets up a situation where spectrum may be excluded from the "club" (the

- Question 6: Do you agree with our revised proposal on the withdrawal of bids in the auction?:

very nature of business is what drives these behaviours), reserving a small portion of spectrum creates the opportunity for left field thinking, differentiating services and will encourage the MNO's to themselves become more disruptive and invest in innovation to keep up with emerging trends

No comment