

Reference: 01781414

Information Requests  
[information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)

30 April 2024

## Freedom of Information request: Right to know request

Thank you for your request for information about addresses with MBNL Radio Equipment.

We received this request on 19 February 2024. We sought clarification of your request on 1 March 2024 and you responded the same day. We then contacted you on 2 April 2024 to advise that we needed to extend the deadline to respond to your request whilst we undertook a public interest test in which we were considering whether one or more of the exceptions in Regulation 12 of the Environmental Information Regulations Act (the “EIR”), in particular, national security and commercial confidentiality, may apply to some of the information requested.

We have considered your request under the Freedom of Information Act 2000 (“the FOI Act”) and the Environmental Information Regulations 2004 (the “EIR”).

### Your request

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*“Please provide the number of addresses in the UK at which Mobile Broadband Network Limited (MBNL) have situated Radio Equipment. I note that Ofcom require MBNL to provide this information as a condition of their spectrum licence”*

On 1 March 2024 you clarified that you were interested in the addresses of any licence that MBNL holds and the addresses of the sites where the equipment is installed.

Following our email where we advised that we needed to extend the deadline to respond to your request, on 2 April 2024 you advised us that *“if providing the specific address is causing issue, then I am happy for you to simply confirm the town or region. I am more interested in the overall number of addresses rather than the actual address itself”*.

### Our response

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Ofcom offers two different types of licence which authorise the licensee to deploy fixed links:

- a) **“block assigned” licences**, which authorise the licensee to deploy as many links or base stations as it wishes within the specified frequencies, and
- b) **“point to point” fixed link licences**, which authorise use of an individual fixed link between base stations in specified locations.

### Block assigned licences

MBNL holds “block assigned” [licences](#) authorising use of spectrum in the 10 GHz, 32 GHz and 40 GHz bands. These licences include a power for Ofcom to request information from MBNL about its deployments, including their locations. We do not routinely request this information, however, in

relation to this licence, we have requested information about MBNL’s fixed links on the following occasions:

- In August 2021, we requested information about MBNL’s fixed links (including their locations) which use the 10, 32 and 40 GHz bands; and
- In May 2023, we requested updated data about MBNL’s fixed links which use the 40 GHz band.

We therefore note that we do not hold accurate and up to date information about all of MBNL’s fixed links.

In light of your clarification that you are content to receive only the overall number of MBNL’s sites per town or region (rather than the precise location of sites), we have provided below a table showing the number of unique sites (based on coordinate pairs we hold) where MBNL has deployed equipment in each of the 10 GHz, 32 GHz and 40 GHz bands in each of the [Counties and Unitary Authorities defined by the ONS](#), based on the data we hold (which is subject to the limitations outlined above).

<b>County or Unitary Authority</b>	<b>10 GHz</b>	<b>32 GHz</b>	<b>40 GHz</b>	<b>Grand Total</b>
<b>Aberdeen City</b>	3	16	23	42
<b>Aberdeenshire</b>	59	48	50	157
<b>Angus</b>	13	15	20	48
<b>Antrim and Newtownabbey</b>	12	5	4	21
<b>Ards and North Down</b>	8	18	18	44
<b>Argyll and Bute</b>	38	22	18	78
<b>Armagh City, Banbridge and Craigavon</b>	21	5	7	33
<b>Barking and Dagenham</b>	1	7	16	24
<b>Barnet</b>		11	28	39
<b>Barnsley</b>	6	20	34	60
<b>Bath and North East Somerset</b>	9	12	16	37
<b>Bedford</b>	14	20	23	57
<b>Belfast</b>	3	13	21	37
<b>Bexley</b>	3	5	15	23
<b>Birmingham</b>	5	33	86	124
<b>Blackburn with Darwen</b>	1	13	18	32
<b>Blackpool</b>		5	16	21
<b>Blaenau Gwent</b>		9	6	15
<b>Bolton</b>	2	21	20	43
<b>Bournemouth, Christchurch and Poole</b>	3	14	26	43
<b>Bracknell Forest</b>	1	9	12	22
<b>Bradford</b>	4	27	63	94
<b>Brent</b>		10	26	36
<b>Bridgend</b>	6	12	16	34

<b>County or Unitary Authority</b>	<b>10 GHz</b>	<b>32 GHz</b>	<b>40 GHz</b>	<b>Grand Total</b>
<b>Brighton and Hove</b>	1	11	15	27
<b>Bristol, City of</b>	2	7	30	39
<b>Bromley</b>	7	14	18	39
<b>Buckinghamshire</b>	26	49	61	136
<b>Bury</b>	2	8	26	36
<b>Caerphilly</b>	9	18	14	41
<b>Calderdale</b>	4	28	25	57
<b>Cambridgeshire</b>	57	82	90	229
<b>Camden</b>		4	41	45
<b>Cardiff</b>	1	14	39	54
<b>Carmarthenshire</b>	26	32	24	82
<b>Causeway Coast and Glens</b>	22	13	8	43
<b>Central Bedfordshire</b>	11	38	46	95
<b>Ceredigion</b>	9	17	4	30
<b>Cheshire East</b>	22	39	59	120
<b>Cheshire West and Chester</b>	21	32	50	103
<b>City of Edinburgh</b>	4	15	59	78
<b>City of London</b>		2	12	14
<b>Clackmannanshire</b>	2		10	12
<b>Conwy</b>	13	9	17	39
<b>Cornwall</b>	27	71	71	169
<b>County Durham</b>	22	54	61	137
<b>Coventry</b>	2	14	30	46
<b>Croydon</b>	1	11	40	52
<b>Cumberland</b>	22	39	30	91
<b>Darlington</b>	1	8	16	25
<b>Denbighshire</b>	15	6	8	29
<b>Derby</b>	1	7	25	33
<b>Derbyshire</b>	36	80	88	204
<b>Derry City and Strabane</b>	16	12	8	36
<b>Devon</b>	74	90	87	251
<b>Doncaster</b>	2	27	38	67
<b>Dorset</b>	32	38	31	101
<b>Dudley</b>	2	9	16	27
<b>Dumfries and Galloway</b>	52	39	37	128
<b>Dundee City</b>	2	2	26	30
<b>Ealing</b>		19	32	51
<b>East Ayrshire</b>	22	25	22	69
<b>East Dunbartonshire</b>	3	6	16	25

<b>County or Unitary Authority</b>	<b>10 GHz</b>	<b>32 GHz</b>	<b>40 GHz</b>	<b>Grand Total</b>
East Lothian	6	12	24	42
East Renfrewshire	5	6	9	20
East Riding of Yorkshire	35	48	49	132
East Sussex	21	56	47	124
Enfield		12	18	30
Essex	37	118	219	374
Falkirk	6	15	36	57
Fermanagh and Omagh	27	7	5	39
Fife	19	46	55	120
Flintshire	4	11	17	32
Gateshead	2	13	17	32
Glasgow City		20	66	86
Gloucestershire	52	44	82	178
Greenwich		12	22	34
Gwynedd	20	15	15	50
Hackney		6	28	34
Halton	4	11	9	24
Hammersmith and Fulham		2	20	22
Hampshire	56	136	151	343
Haringey		10	21	31
Harrow	1	3	17	21
Hartlepool		7	15	22
Havering	2	9	23	34
Herefordshire, County of	31	25	4	60
Hertfordshire	28	82	174	284
Highland	110	35	33	178
Hillingdon		14	29	43
Hounslow		12	32	44
Inverclyde	2	5	10	17
Isle of Anglesey	8	3	7	18
Isle of Wight	5	11	16	32
Islington		8	30	38
Kensington and Chelsea		7	28	35
Kent	68	138	202	408
Kingston upon Hull, City of	3	10	17	30
Kingston upon Thames	1	6	8	15
Kirklees	6	32	45	83
Knowsley	3	9	19	31
Lambeth		10	42	52

<b>County or Unitary Authority</b>	<b>10 GHz</b>	<b>32 GHz</b>	<b>40 GHz</b>	<b>Grand Total</b>
Lancashire	33	96	158	287
Leeds	4	54	79	137
Leicester	5	10	28	43
Leicestershire	56	64	73	193
Lewisham	1	3	27	31
Lincolnshire	103	85	102	290
Lisburn and Castlereagh	7	9	6	22
Liverpool	1	12	56	69
Luton	1	10	19	30
Manchester	1	24	55	80
Medway	2	15	12	29
Merthyr Tydfil	1	2	4	7
Merton		5	13	18
Mid and East Antrim	14	12	14	40
Mid Ulster	16	7	4	27
Middlesbrough		4	16	20
Midlothian	5	9	11	25
Milton Keynes	7	18	29	54
Monmouthshire	12	15	12	39
Moray	17	15	7	39
Na h-Eileanan Siar	7	2	4	13
Neath Port Talbot	12	16	21	49
Newcastle upon Tyne	2	10	37	49
Newham		6	25	31
Newport	6	13	10	29
Newry, Mourne and Down	14	19	4	37
Norfolk	61	99	104	264
North Ayrshire	7	20	14	41
North East Lincolnshire	7	8	20	35
North Lanarkshire	4	23	59	86
North Lincolnshire	13	18	26	57
North Northamptonshire	20	32	48	100
North Somerset	10	26	21	57
North Tyneside	1	11	16	28
North Yorkshire	62	89	75	226
Northumberland	39	53	48	140
Nottingham	1	7	29	37
Nottinghamshire	49	73	97	219
Oldham	2	13	27	42

<b>County or Unitary Authority</b>	<b>10 GHz</b>	<b>32 GHz</b>	<b>40 GHz</b>	<b>Grand Total</b>
Orkney Islands	4			4
Oxfordshire	49	78	73	200
Pembrokeshire	20	15	15	50
Perth and Kinross	52	38	33	123
Peterborough	4	18	18	40
Plymouth	3	9	21	33
Portsmouth		6	17	23
Powys	50	31	20	101
Reading	2	8	14	24
Redbridge		12	8	20
Redcar and Cleveland	2	9	17	28
Renfrewshire	7	6	24	37
Rhondda Cynon Taf	9	17	22	48
Richmond upon Thames		5	17	22
Rochdale	8	14	25	47
Rotherham	4	11	45	60
Rutland	8	7	13	28
Salford	3	9	25	37
Sandwell	2	8	36	46
Scottish Borders	41	39	39	119
Sefton	1	14	19	34
Sheffield	6	18	62	86
Shetland Islands	3		5	8
Shropshire	57	25	43	125
Slough		3	8	11
Solihull	3	8	35	46
Somerset	53	62	39	154
South Ayrshire	14	19	28	61
South Gloucestershire	11	22	28	61
South Lanarkshire	20	48	63	131
South Tyneside	1	5	14	20
Southampton	1	14	13	28
Southend-on-Sea	1	4	13	18
Southwark		13	37	50
St. Helens	3	4	24	31
Staffordshire	47	91	107	245
Stirling	14	17	18	49
Stockport	4	14	30	48
Stockton-on-Tees	1	17	22	40

County or Unitary Authority	10 GHz	32 GHz	40 GHz	Grand Total
Stoke-on-Trent	5	12	31	48
Suffolk	48	86	100	234
Sunderland	4	15	31	50
Surrey	32	94	132	258
Sutton	2	3	10	15
Swansea	10	20	17	47
Swindon	4	12	23	39
Tameside	1	7	29	37
Telford and Wrekin	6	11	16	33
Thurrock	2	8	18	28
Torbay	3	5	15	23
Torfaen	4	6	2	12
Tower Hamlets		8	32	40
Trafford	5	9	30	44
Vale of Glamorgan	7	14	21	42
Wakefield	7	35	41	83
Walsall	2	11	15	28
Waltham Forest		4	17	21
Wandsworth		8	29	37
Warrington	6	16	29	51
Warwickshire	34	64	81	179
West Berkshire	14	30	26	70
West Dunbartonshire	4	4	13	21
West Lothian	13	16	29	58
West Northamptonshire	35	54	64	153
West Sussex	40	59	76	175
Westminster		17	55	72
Westmorland and Furness	51	33	37	121
Wigan	8	19	31	58
Wiltshire	53	62	75	190
Windsor and Maidenhead		8	18	26
Wirral	4	18	24	46
Wokingham	8	5	15	28
Wolverhampton	2	9	21	32
Worcestershire	27	54	77	158
Wrexham	8	9	10	27
York	3	11	23	37
<b>Grand Total</b>	<b>2908</b>	<b>4986</b>	<b>7386</b>	<b>15280</b>

## Point to point fixed link licences

Information about all of the point to point fixed link licences Ofcom has issued is publicly available on Ofcom's website, in the Wireless Telegraphy Register, which is available [here](#) (note column 'AJ' shows the licensee name).

We hope that this information is helpful. If you have any further queries, then please send them to [information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk) – quoting the reference number above in any future communications.

Yours sincerely,

## Information Requests

### Request an internal review

If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress.

Please email the Information Requests team ([information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)) to request an internal review.

### Taking it further

If you are unhappy with the outcome of our internal review, then you have the right to [complain to the Information Commissioner's Office](#).