

From: [REDACTED]
To: [REDACTED]
Subject: Re: EIR request: The release of information for the number of sites where MBNL's equipment is installed
Date: 29 April 2024 12:45:00
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Hi [REDACTED],

I note you have not expressed any concerns over our proposed response to this EIR request. We will reply to the requester on 30 April 2024 as outlined in my email of 24 April 2024.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: Wednesday, April 24, 2024 3:20 PM
To: [REDACTED]@mbnl.co.uk>; [REDACTED]@mbnl.co.uk>
Subject: RE: EXTERNAL:Re: EIR request: The release of information for the number of sites where MBNL's equipment is installed

Hi [REDACTED],

Thanks for coming back to me. I apologise for the short notice.

It has taken us some time to work out what information we hold internally and whether an exception may apply. The purpose of our courtesy email was to inform you that we plan to release the information and to give you the opportunity to express any concerns. We do not require a response from you in order to process the request but wanted to give you advance warning. I hope that clarifies the position but please do let me know if it may be helpful to discuss.

Kind regards,

[REDACTED]

From: [REDACTED]@mbnl.co.uk>
Sent: Wednesday, April 24, 2024 1:27 PM
To: [REDACTED]@ofcom.org.uk>; [REDACTED]@mbnl.co.uk>
Subject: EXTERNAL:Re: EIR request: The release of information for the number of sites where MBNL's equipment is installed

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Hi [REDACTED],

I'm a little confused here. FOI requests need to be responded to within 20 working days. You've sent us this request with less than 48 hours' notice. Please can you advise why this notice has arrived so late?

Thanks,

[REDACTED]

[REDACTED]
[REDACTED]

MBNL

[REDACTED]

[REDACTED] [@mbnl.co.uk](mailto:[REDACTED]@mbnl.co.uk)

From: [REDACTED] [@ofcom.org.uk](mailto:[REDACTED]@ofcom.org.uk)>

Sent: Wednesday, April 24, 2024 12:53:46 PM

To: [REDACTED] [@mbnl.co.uk](mailto:[REDACTED]@mbnl.co.uk)>; [REDACTED] [@mbnl.co.uk](mailto:[REDACTED]@mbnl.co.uk)>

Subject: EIR request: The release of information for the number of sites where MBNL's equipment is installed

Some people who received this message don't often get email from [REDACTED] [@ofcom.org.uk](mailto:[REDACTED]@ofcom.org.uk). [Learn why this is important](#)

Dear [REDACTED] and [REDACTED],

We have received a freedom of information (FOI) request which we are *dealing with under the Environmental Information Regulations 2004 (EIR)*. The request states: "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." The requester has subsequently clarified that they are interested in the overall number of sites where MBNL's equipment is installed and the town or region in which the equipment is installed (rather than the precise addresses).

As you will be aware, the location of some of MBNL's fixed links is already publicly available in the [Wireless Telegraphy Register](#) (WTR). We also hold information on the location of MBNL's fixed links in the block assigned 10, 32 and 40 GHz bands that are not publicly available in the WTR but which MBNL has provided to us in response to requests for this information under the terms of its licences. MBNL provided information to us in relation to all three bands in 2021 and an updated dataset was provided to us in relation to MBNL's fixed links in the 40 GHz band in 2023.

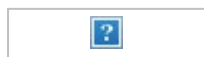
We note MBNL has previously shared concerns with us in relation to disclosing the location of its 40 GHz links in the context of the mmWave project, on the basis that MBNL considered it could give competitors an advantage. In this context, we have considered whether any of the limited exceptions to disclosing information set out in [Regulation 12 FIR](#) may apply to this request.

Taking into account relevant [ICO Guidance](#), we do not consider any exception may apply to this request, in particular as the request is for the town or region in which MBNL's equipment is installed and not specific coordinates or precise addresses.

We are therefore proposing to provide the requested information in response to the FOI request. We are proposing to provide the location of links according to the data MBNL shared with us in 2021 and 2023. However, we will *not* share the precise location of MBNL's links, rather we intend to share information on the number of MBNL's links we hold information on in each local authority area (as defined by the ONS).

As we are intending to publish information provided to us by MBNL we wanted to give you advance warning. We are subject to statutory deadlines and intend to publish this information on 30 April. **If you have any concerns about our proposed approach, we would be grateful if you could please let us as soon as possible and no later than 9am on 26 April 2024.**

Kind regards,



Riverside House
2a Southwark Bridge Road
London SE1 9HA
www.ofcom.org.uk



For more information visit www.ofcom.org.uk

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