

From: [REDACTED]
To: [REDACTED]; [REDACTED]
Subject: RE: EXTERNAL:RE: EIR request: MBNL Radio Equipment addresses
Date: 14 March 2025 17:12:00
Attachments: [image001.png](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)

Hi [REDACTED].

Thanks for your response and agreeing for us to share the data for this request.

Of course we will be happy to check with you for future, individual requests.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 14 March 2025 14:14
To: [REDACTED]; [REDACTED]
Subject: EXTERNAL:RE: EIR request: MBNL Radio Equipment addresses

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CON3 - THIS COMMUNICATION IS CONFIDENTIAL TO MBNL & NAMED SUPPLIERS ONLY

Hi [REDACTED],

Thank you for your email. I can confirm that MBNL agree with sharing the data you hold regarding MBNL's radio equipment for the specified sites. However, we would prefer to review and approve each individual request made by or on behalf of AP Wireless or any other application, rather than giving blanket consent for future requests.

Thanks

[REDACTED]



- [REDACTED]
- [REDACTED]@mbnl.co.uk
- Mobile Broadband Network Limited

Sixth Floor, Thames Tower
Station Road, Reading, RG1 1LX

A joint venture company between EE and Three

From: [REDACTED]@ofcom.org.uk>

Sent: 11 March 2025 19:19

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

Subject: EIR request: MBNL Radio Equipment addresses

You don't often get email from [REDACTED]@ofcom.org.uk. [Learn why this is important](#)

CON3 - THIS COMMUNICATION IS CONFIDENTIAL TO MBNL & NAMED SUPPLIERS ONLY

Dear [REDACTED] and [REDACTED],

I hope you are well. We are writing to let you know that we have received an information request from [REDACTED] on behalf of APWireless, requesting information about MBNL's radio equipment at 11 specified sites, specifically whether MBNL is present at the sites identified – see below. We are dealing with this request under the Environmental Information Regulations 2004. Please note it is our usual practice to publish all responses to FOI and EIR requests. We have checked the sites against our records of MBNL's radio equipment, and we believe that MBNL have installed radio equipment around 7 of the sites specified, as shown in the table below.

| AP Wireless site name | MBNL site likely co-located? |
|------------------------------|-------------------------------------|
| Crownland Hall Farm | Y |
| Chase Farm | N |
| Mumsford Farm | Y |
| Manor Farm | Y |
| Model Farm | Y |
| Bradley Wood | N |
| Saddleworth Golf Club | N |
| Kingsthorpe Golf Club | Y |
| Edgemead Close | N |
| Greenmount Golf Club | Y |
| Rotherwas WBS | Y |

We are legally required to share this information with [REDACTED], unless a specific exception in the EIR applies (and on balance we consider the public interest favours withholding the information). In this case, we think the potentially relevant exceptions to us disclosing this information would be that the information is commercially sensitive or raises national security concerns.

We are therefore writing to you to give you the opportunity to provide your view on whether you consider that disclosing MBNL's presence at any of the relevant sites (1) is confidential and that disclosure would adversely affect MBNL's legitimate interests; or (2) raises national security risks to the extent the links are used for critical infrastructure. If you would like to raise concerns about this request, we would be grateful if your response could take into account the following points:

- The requestor has previously claimed to be acting on behalf of MBNL's landlord which is

likely to be relevant to any claim of commercial confidentiality.

The requestor provided only the postcode of the site to which the request relates – and some of these sites are in locations where a single postcode can cover a large area. We have therefore converted the postcodes they provided into lat/long coordinates which we can compare we the information we hold about MBNL’s sites. However, as this entails turning an area (a postcode) into a point (a set of coordinates) we have had to apply some judgment. You may find it helpful to refer to the ICO’s guidance in relation to the [national security exception](#) and the [commercial confidentiality exception](#).

It’s worth noting that the data we hold may not be accurate, as the only data we currently hold about MBNL’s use of the 10 and 32 GHz bands was obtained in 2021, and the data we hold on MBNL’s fixed links which use the 40 GHz band was last updated in May 2023. It may therefore be in MBNL’s interests to liaise directly with [REDACTED]/APWireless on this request.

Given the statutory deadline of 21 March 2025 for us to reply to [REDACTED], **we would be grateful if MBNL could get back to us on this by Monday 17 March, if possible please.**

It would also be useful to understand if MBNL would consent to us sharing their data in response to any similar future requests made by or on behalf of AP Wireless, or if MBNL would prefer us to come back to them each time.

Kind regards

[REDACTED]
[REDACTED]



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