

Your response

Question	Your response
<p>Question 1: Do you agree that Ofcom should consider working with relevant industry partners to develop a voluntary testing standard, and publishing a list on our website of static indoor mobile phone repeaters that comply with our licence exemption requirements?</p>	<p>Confidential? – N We understand that OFCOM seeks to help people and businesses improve coverage in their home.</p> <p>We support an installation and testing standard and list of compliant mobile phone repeaters and recommend there are suitable controls implemented such as a register to ensure license exempt systems are not being deployed in large commercial venues or similar which would be better served by DAS or small cells delivering ring fenced capacity to the venue. Large scale deployments of this type utilising licence exempt equipment run the risk of significantly degrading MNO or Neutral Host outdoor and indoor service quality as the repeater will have a parasitic effect on the donor network capacity and contribute to uplink noise.</p> <p>In the event network degradation occurs, protection must be provided to MNOs and Neutral Hosts and a ratified process provided enabling a mechanism for the repeater system to be decommissioned or re-engineered.</p> <p>Our recommendation is that license exempt systems should only be dimensioned to support a maximum of 10 users. Larger scale systems should be subject to coordination with MNOs or Neutral Hosts and be compliant with the latest revision of JOTS (DAS) or JOTS NHIB (small cells). An exception to this, is for the provision of temporary coverage (less than 6 months) to key locations in a building ahead of a permanent DAS or small cells solution being deployed.</p>
<p>Question 2: Do you agree that we should modify IR 2102.1 to allow for ‘provider specific’ mobile phone repeaters? If you do not agree, please explain your reasons.</p>	<p>Confidential? – N We understand that OFCOM seeks to help people and businesses improve coverage in their home and that provider specific repeaters may simplify this process.</p> <p>All comments made in Q1 are also applicable for Q2.</p>
<p>Question 3: Do you agree that we should make ‘multi-operator’ mobile phone repeaters complying with the technical requirements outlined above (and set out in the draft UK</p>	<p>We understand that OFCOM seeks to help people and businesses improve coverage in their home and that multi-operator repeaters may simplify this process.</p>

<p>Radio Interface Requirement IR 2102.3 at Annex A3) licence exempt? If you do not agree, please explain your reasons.</p>	<p>All comments made in Q1 are also applicable for Q3.</p>
<p>Question 4: Do you agree with our provisional view as set out in paragraph 3.48 above? If you do not agree, please explain why you think the requirement is not necessary.</p>	<p>Confidential? – N WIG welcomes the approach to deliver 4G only services for multi-operator repeaters as specified in paragraph 3.48 on the basis that this is extended to other technologies such as DAS and small cells and be considered fully compliant in terms of MNO licensing conditions for emergency calling. To be clear this would remove any requirement for circuit switched fall back (CSFB) for indoor networks to deliver voice connectivity for non-VoLTE capable handsets.</p>
<p>Question 5: Do you agree that it would not be appropriate to allow the use of licence-exempt repeaters in the 2.6 GHz band? If you do not agree, please explain your reasons.</p>	<p>Confidential? – N WIG agrees with the restriction at 2.6GHz</p>
<p>Question 6: Do you agree that we should allow the use of static indoor mobile phone repeaters (on a licence-exempt basis) in the paired 700 MHz mobile band?</p>	<p>Confidential? – N WIG agrees that 700MHz should be permitted. All comments made in Q1 are also applicable for Q6.</p>