

Proposal to amend the Mobile Trading Regulations

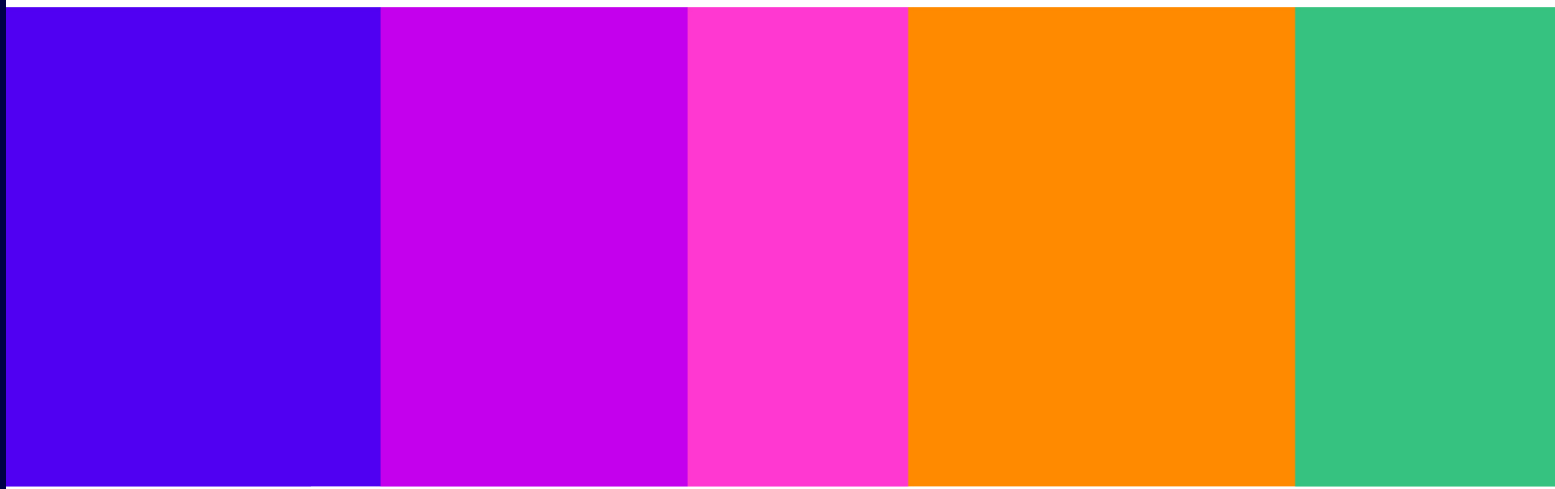
Consultation on proposals to amend the
Mobile Trading Regulations and notice of
proposal to make Regulations

Consultation

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For more information on this publication, please visit [ofcom.org.uk](https://www.ofcom.org.uk)



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1. Overview

- 1.1 We charge Annual Licence Fees (“**ALFs**”) for use of spectrum in the 900 MHz, 1800 MHz and 2100 MHz bands, and we have today published our decision to revise these fees. We have also today decided to allow these annual fees to be paid in 12 monthly instalments.
- 1.2 The Regulations which require payment of ALFs provide that a licensee becomes liable for a year’s worth of ALFs if it holds the relevant spectrum licence on the ‘fee payment date’, even if it subsequently trades the spectrum in the same payment cycle. We allow licensees to pay that ALF in 12 monthly instalments.
- 1.3 In addition, there is currently a provision in the Wireless Telegraphy (Mobile Spectrum Trading) Regulations 2011 (the “**Mobile Trading Regulations**”) that requires a licensee who has opted to pay in instalments, to pay an entire years’ worth of these ALFs upfront before it can trade spectrum in the 900 and 1800 MHz bands.
- 1.4 We understand that these two requirements can require a licensee to bring forward payment of potentially significant sums before a trade, and we understand that this can amount to a barrier to trading of spectrum. We consider it important to remove barriers to such trading where possible. Therefore, we are proposing to amend the Mobile Trading Regulations to remove the requirement to pay all fees due for use of 900 MHz and 1800 MHz spectrum before a trade.

What we are proposing – in brief

We are seeking views on our proposal to amend Regulation 6 of the Mobile Trading Regulations to remove the requirement to pay all instalments of ALFs due before a trade.

The overview section in this document is a simplified high-level summary only. The proposal we are consulting on, and our reasoning are set out in the full document.

2. Amendment of the Mobile Trading Regulations

Background

Review of Annual Licence Fees (“ALFs”)

- 2.1 In December 2024, we [consulted](#) on proposals to revise the ALFs payable for use of spectrum in the 900 MHz, 1800 MHz and 2100 MHz bands. As part of this review, we also considered whether we could simplify how ALFs are paid, and in February 2025, we [consulted](#) on proposals for simplifying payment of ALFs.
- 2.2 We set out our decisions on the proposals in these consultations in a [statement](#) published today (the “**July 2025 ALF statement**”).

Requirement to pay ALFs before spectrum trades

- 2.3 Under our revised ALF Regulations (as well as previous ALF Regulations), a licensee will become liable for a year’s worth of ALFs if it holds the relevant spectrum licence on the ‘fee payment date’, even if it subsequently trades the spectrum during that year. We allow licensees to pay that ALF in 12 monthly instalments.¹
- 2.4 There is also a requirement under Regulation 6 of the [Wireless Telegraphy \(Mobile Spectrum Trading\) Regulations 2011](#) (the “**Mobile Trading Regulations**”) that licensees must pay all outstanding 900 MHz and 1800 MHz ALF instalments before they can trade mobile spectrum.² This means that if a mobile network operator (“**MNO**”) who has opted to pay in instalments wishes to trade spectrum partway through the fee payment cycle, it must pay upfront the remaining ALF instalments due for ALF spectrum held under that licence to Ofcom before it is able to trade its spectrum. We understand that these requirements can amount to a barrier to trading, as they can require licensees to bring forward payment of significant sums of money before completing a trade.
- 2.5 To help address this potential barrier, we considered a more frequent accrual of liability in our [February 2025 consultation](#). However, we proposed not to proceed, because of limited support from MNOs and because implementation in our systems would be complex.³
- 2.6 As set out in our July 2025 ALF statement, we received mixed feedback on this proposal:⁴
- BT/EE and VMO2 supported sticking to annual liability. Both noted we should continue to identify and remove barriers to trading. VMO2 noted that enhancing the conditions

¹¹ The first instalment is to be paid to Ofcom on the same day as the total sum was due to be paid and each subsequent instalment is to be paid on the same day in each of the following eleven months, or in a month in which there is no such day, the last day of the month.

² We note that (i) this requirement relates to ALFs due under the Wireless Telegraphy (Licence Charges for the 900 MHz Frequency Band and the 1800 MHz Frequency Band) Regulations 2018, so would anyway fall away when we make new ALF Regulations to implement the decisions set out in this document; and (ii) this requirement does not currently apply in respect of 2100 MHz ALFs.

³ February 2025 ALF consultation, section 5.

⁴ July 2025 ALF statement paragraphs 7.4 - 7.12

for trading would “contribute to enabling improved allocation and use of mobile spectrum benefitting UK mobile users.”⁵

- H3G and Vodafone asked us to reconsider our position. Both suggested that if we were unable to move to monthly liability for ALFs, we could instead consider amending the Mobile Trading Regulations to remove the requirement to pay outstanding instalments of ALFs before a trade.

Our proposal

Removal of the requirement to pay upcoming instalments of ALFs before a spectrum trade

- 2.7 In light of VMO2, H3G and Vodafone’s responses to the February 2025 consultation, we have considered whether amending the Mobile Trading Regulations might be an alternative way to remove this potential barrier to trading.
- 2.8 We note that removing the requirement in the Mobile Trading Regulations to pay all outstanding ALF instalments before a trade could:
- a) remove a barrier to trading; but also
 - b) give rise to a potential risk to Ofcom (and HMT), should the licensees default on instalment payments after the trade.
- 2.9 We consider that removing this barrier to trading is likely to support the efficient use of spectrum. We recognise that removing the requirement could result in some additional risk and administrative burden for Ofcom in the event that a licensee defaults on instalment payments following a trade. However, we note that:
- a) the risk that licensees default on instalment payments after a trade is unlikely to materialise; and
 - b) even in such a case, we would be able to recover the outstanding fees.⁶
- 2.10 We therefore assess the overall risk to be minimal, and we consider that the benefit of removing this barrier to trading outweighs this risk.
- 2.11 Therefore, we propose to amend Regulation 6 of the Mobile Trading Regulations to remove the requirement under Regulation 6(c)(ii) to pay all instalments of ALFs due under the 2018 900 MHz and 1800 MHz ALF Regulations before a trade. This would remove the requirement for MNOs to pay upfront the remaining ALF instalments due for ALF spectrum held under that licence to Ofcom before it is able to trade its spectrum.⁷

Other updates to Regulation 6 of the Mobile Trading Regulations

- 2.12 We also propose to make two other amendments to Regulation 6 of the Mobile Trading Regulations to:
- a) remove Regulation 6(b)(i) and Regulation 6(c)(i), which refer to the Wireless Telegraphy (Licence Charges) Regulations 2011; and

⁵ VMO2 consultation response, pg. 4

⁶ [Section 15 of the Wireless Telegraphy Act 2006](#) provides that a spectrum licence fee must be paid to Ofcom as soon as it becomes due and, if it is not paid, it is to be recoverable by them accordingly.

⁷ We note that as the requirement currently applies to the old ALF regulations, it would anyway not have any effect once the 2018 regulations are revoked. We nevertheless think it is worthwhile to amend the Mobile Trading Regulations to make clear that this requirement no longer applies.

- b) amend Regulation 6(b)(ii), which prevents licensees trading spectrum if fees are due under the 2018 Regulations which set ALFs for 900 MHz and 1800 MHz spectrum.

Proposal to omit Regulation 6(b)(i) and 6(c)(i)

- 2.13 Currently, Regulation 6(b)(i) and 6(c)(i) reference the Wireless Telegraphy (Licence Charges) Regulations 2011 (the “**2011 Licence Charges Regulations**”). These Regulations are intended to prevent the authorisation of trades where fees due under the 2011 Licence Charges Regulations are owed to Ofcom.
- 2.14 We note that:
 - a) the 2011 Licence Charges Regulations have been revoked⁸ and replaced by the Wireless Telegraphy (Licence Charges) Regulations 2020 (the “**2020 Regulations**”); and
 - b) the spectrum which is the subject of the 2020 Regulations is not mobile spectrum, and so the provisions of the Mobile Trading Regulations do not apply to this spectrum.
- 2.15 As a result, we consider that Regulations 6(b)(i) and 6(c)(i), which refer to the 2011 Licence Charges Regulations, are now redundant. We therefore propose to omit them.

Proposal to amend Regulation 6(b)(ii)

- 2.16 Regulation 6(b)(ii) is intended to prevent a licensee trading spectrum where there are outstanding ALFs due. Unlike Regulation 6(c), this Regulation is intended to prevent trades where there are outstanding fees due which should have *already* been paid, for example, a previous year’s fees, or instalment payments which have become due earlier in a given year. We do not intend to make a policy change to this, however, we propose to update this Regulation because:
 - a) it currently refers to ALFs due under the 2018 Regulations, which set ALFs for 900 MHz and 1800 MHz spectrum (which we are revoking and replacing with new Regulations which will give effect to the decisions set out in our July 2025 Statement); and
 - b) it does not currently refer to ALFs due for use of 2100 MHz spectrum, resulting in an inconsistency in the application of the requirement to pay ALFs before a trade.
- 2.17 Therefore, we propose to replace the current text in Regulation 6(b) with updated text which refers to:
 - a) the Wireless Telegraphy (Licence Charges for the 900 MHz Frequency Band and the 1800 MHz Frequency Band) Regulations 2025; and
 - b) the Wireless Telegraphy (Licence Charges for the 2100 MHz Frequency Band) Regulations 2025, to give effect to our policy intention to treat trades of spectrum in the 2100 MHz consistently with how we treat trades in the 900 MHz and 1800 MHz bands.

Amendment to our Trading Guidance Notes

- 2.18 If we proceed with this proposal, we also intend to update paragraph 3.27 of our [trading guidance notes](#), to make it clear that we expect the original licensee of the spectrum (the seller) to continue to pay all ALF instalments for a relevant year, even if it trades spectrum partway through the year.

⁸ See s.3 and Schedule 1 of [The Wireless Telegraphy \(Licence Charges\) Regulations 2020](#)

- 2.19 Draft Regulations which would implement our proposal to amend the Mobile Trading Regulations are included at Annex 1 of this document.
- 2.20 We welcome responses to this consultation by 5pm on 12 September 2025.

Consultation question

Do you agree with our proposals to:

- amend the Mobile Trading Regulations to remove the requirement to pay any outstanding ALF instalment payments upfront before a trade?
- make the other updates to Regulation 6 of the Mobile Trading Regulations described in paragraphs 2.12-2.17?

A1. Draft Wireless Telegraphy (Mobile Spectrum Trading) (Amendment) Regulations 2025

STATUTORY INSTRUMENTS

[2025] No.

ELECTRONIC COMMUNICATIONS

The Wireless Telegraphy (Mobile Spectrum Trading) (Amendment) Regulations [2025]

Made - - - - - ***

Coming into force ***

The Office of Communications (“OFCOM”) make these Regulations in exercise of the powers conferred by sections 30(1) and (3) and 122(7) of the Wireless Telegraphy Act 2006⁽⁹⁾ (“the Act”).

Before making these Regulations, OFCOM gave notice of their proposal to do so in accordance with section 122(4)(a) of the Act, published notice of their proposal in accordance with section 122(4)(b) of the Act, and have considered the representations made to them before the time specified in the notice in accordance with section 122(4)(c) of the Act.

Citation and commencement

1. These Regulations may be cited as the Wireless Telegraphy (Mobile Spectrum Trading) (Amendment) Regulations [2025] and come into force on [date, month, year].

Amendment of the Wireless Telegraphy (Mobile Spectrum Trading) Regulations 2011

2.—In the Wireless Telegraphy (Mobile Spectrum Trading) Regulations 2011⁽¹⁰⁾, in regulation 6 (circumstances in which a transfer is not authorised) –

- (a) for paragraph (b) substitute–
- “(b) any sum payable in respect of that licence under
 - (i) the Wireless Telegraphy (Licence Charges for the 900 MHz Frequency Band and 1800 MHz Frequency Band) Regulations 2025 ⁽¹¹⁾; or

⁽⁹⁾ 2006 c.36
⁽¹⁰⁾ S.I. 2011/1507, amended by S.I. 2013/646, S.I. 2015/1339, S.I. 2019/951 and S.I. 2024/571.
⁽¹¹⁾ S.I. [2025]/xxx.

(ii) the Wireless Telegraphy (Licence Charges for the 2100 MHz Frequency Band) Regulations 2025⁽¹²⁾;

is owing to OFCOM because it has not been paid by the time it became due;”;

(b) omit paragraph (c).

Signatory text

	<i>Name</i>
	Director of Spectrum Group
Date	For and by the authority of the Office of Communications

EXPLANATORY NOTE

(This note is not part of the Regulations)

These Regulations amend the Wireless Telegraphy (Mobile Spectrum Trading) Regulations 2011 (S.I. 2011/1507, amended by S.I. 2013/646, S.I. 2015/1339, S.I. 2019/951 and S.I. 2024/571).

Regulation 2 amends regulation 6 by removing reference to the Wireless Telegraphy (Licence Charges) Regulations 2011 and substitutes the Wireless Telegraphy (Licence Charges for the 900 MHz Frequency Band and the 1800 MHz Frequency Band) Regulations 2018 with the new the Wireless Telegraphy (Licence Charges for the 900 MHz Frequency Band and 1800 MHz Frequency Band) Regulations 2025. It also amends regulation 6 to include the Wireless Telegraphy (Licence Charges for the 2100 MHz Frequency Band) Regulations 2025. This regulation also removes the requirement in regulation 6 for all outstanding instalment payments to be paid to OFCOM before a transfer can take place.

A full impact assessment of the effect that this instrument will have on the costs to business and the voluntary sector is available to the public from OFCOM at Riverside House, 2a Southwark Bridge Road, London SE1 9HA (Tel: 020 7981 3000) or on the OFCOM internet website at www.ofcom.org.uk. Copies of the report have also been placed in the libraries of both Houses of Parliament

⁽¹²⁾ S.I.[2025]/xxx.

A2. Legal Framework

Relevant legal framework

- A2.1 Ofcom is responsible for authorising and managing use of radio spectrum in the UK. This is a limited and valuable resource, and one of our main duties is to secure its optimal use.
- A2.2 In managing the use of spectrum in the UK, Ofcom either authorises its use through a wireless telegraphy licence granted in accordance with section 8 of the Wireless Telegraphy Act 2006 (the “**Wireless Telegraphy Act**”), or by making its use licence exempt. It is unlawful and an offence to install or use wireless telegraphy apparatus without holding a licence granted by Ofcom unless the use of such equipment is exempted.
- A2.3 Ofcom has a range of powers and duties to help it secure the optimal use of spectrum. These include requirements for spectrum trading and the establishment of a public register containing relevant information about licences and licence transfers.

Spectrum trading

- A2.4 The holder of a licence under the Wireless Telegraphy Act cannot transfer its licence to another party. However, spectrum trading is a process that allows the holders of certain wireless telegraphy licences granted by Ofcom under section 8 of the Wireless Telegraphy Act to transfer or lease the rights to use spectrum to another party. Transfers are permitted only for those licences where Ofcom has made regulations under section 30 of the Wireless Telegraphy Act.
- A2.5 We began the implementation of spectrum trading for selected licence classes by making regulations in 2004. Those regulations have been updated at intervals and the current rules relating to trades of non-mobile spectrum are set out in The Wireless Telegraphy (Spectrum Trading) Regulations 2012 (the “**General Trading Regulations**”).
- A2.6 In 2011, we extended trading to the 900 MHz, 1800 MHz and 2100 MHz bands by making the Wireless Telegraphy (Mobile Spectrum Trading) Regulations 2011 which came into force on 4 July 2011 (the “**Mobile Trading Regulations**”).
- A2.7 Section 30(2) of the Wireless Telegraphy Act provides that Ofcom may authorise a range of spectrum transfers. In particular, these may be: outright or concurrent; and total or partial.
- A2.8 The Mobile Trading Regulations authorise both outright and concurrent transfers, as well as total and partial transfers. Partial trades can be used to transfer the rights and obligations concerning only certain frequencies or geographical areas covered by the licence.
- A2.9 The 900 MHz, 1800 MHz and 2100 MHz frequency band licences are covered by the Mobile Trading Regulations and are subject to additional conditions in relation to a transfer. In order for a transfer to take place Ofcom must first consent to the transfer. In determining whether or not to consent to a proposed transfer, as outlined in Regulation 6 of the Mobile Trading Regulations, the licensee (among others) is required to pay in full all spectrum fees under that licence before any trade is authorised.

Impact assessment

- A2.10 Section 7 of the Communications Act 2003 requires us to carry out and publish an assessment of the likely impact of implementing a proposal which may significantly impact businesses or the public, or when there is a major change in Ofcom's activities.
- A2.11 Impact assessments form part of good policy making, and we therefore expect to carry them out in relation to a large majority of our proposals. We use impact assessments to help us understand and assess the potential impact of our policy decisions before we make them. They also help us explain the policy decisions we have decided to take and why we consider those decisions best fulfil our applicable duties and objectives in the least intrusive way. Our [impact assessment guidance](#) sets out our general approach to how we assess and present the impact of our proposed decisions.
- A2.12 We consider that removing the requirement in Regulation 6 c(ii) of the Mobile Trading Regulations will remove a barrier to trading, facilitating more efficient use of Spectrum.
- A2.13 Our proposed approach could potentially result in unpaid fees but considering historical trading frequencies and the likelihood of unpaid fees, we believe this risk is very low. Even if our proposed approach leads to an increase in trading volumes and therefore an increased risk of unpaid fees, should fees remain outstanding, we have recourse to the courts.
- A2.14 Our provisional view is that, on balance, the benefits of our proposed approach are likely to outweigh any potential impact, but we welcome views.
- A2.15 We do not consider that the other updates we are proposing to make to Regulation 6 of the Mobile Trading Regulations will have any adverse impact on businesses or the public.

Equality impact assessment

- A2.16 We have given careful consideration to whether our proposals will have a particular impact on persons sharing protected characteristics (broadly including race, age, disability, sex, sexual orientation, gender reassignment, pregnancy and maternity, marriage and civil partnership and religion or belief in the UK and also dependents and political opinion in Northern Ireland), and in particular whether they may discriminate against such persons or impact on equality of opportunity or good relations. This assessment helps us comply with our duties under the Equality Act 2010 and the Northern Ireland Act 1998.¹³ We have also had regard to the matters in section 3(4) of the Communications Act.
- A2.17 When thinking about equality we think more broadly than persons that share protected characteristics identified in equalities legislation and think about potential impacts on various groups of persons (see paragraph 4.7 of our impact assessment guidance).
- A2.18 Our provisional view is that our proposal would not affect any specific groups of persons (including persons that share protected characteristics under the 2010 Act or the 1998 Act) differently to the general population.

¹³ Section 75 of the Northern Ireland Act 1998.

Welsh language

- A2.19 Ofcom is required to take Welsh language considerations into account when formulating, reviewing or revising policies which are relevant to Wales (including proposals which are not targeted at Wales specifically but are of interest across the UK).¹⁴
- A2.20 We do not consider our proposals to have any impact on opportunities for persons to use the Welsh language or treating the Welsh language no less favourably than the English language. We also do not think there are ways in which our decision and proposals could be formulated so as to have, or increase, a positive impact, or not have adverse effects or decrease any adverse effects. This is because our proposals relate to spectrum access across the UK.

¹⁴ See Standards 84 – 89 of Hysbysiad cydymffurfio (in Welsh) and compliance notice in English. Section 7 of the Welsh Language Commissioner’s Good Practice Advice Document provides further advice and information.

A3. Notice of proposal to make Regulations

- A3.1 This document also gives notice of our intention to make the Wireless Telegraphy (Mobile Spectrum Trading) (Amendment) Regulations 2025.
- A3.2 The proposed regulations would amend the Wireless Telegraphy (Mobile Spectrum Trading) Regulations 2011 (the “**Mobile Trading Regulations**”) to omit Regulation 6(c)(ii).
- A3.3 The main effect of this amendment is to remove a barrier to trading spectrum by removing the requirement in the Mobile Trading Regulations for all outstanding instalment payments to be paid to Ofcom before a transfer can take place. The amendment also has the effect of bringing the 900 and 1800 MHz licences in line with the 2100 MHz licences.
- A3.4 We propose to further amend Regulation 6(b)(ii) of the Mobile Trading Regulations to substitute the Wireless Telegraphy (Licence Charges for the 900 MHz Frequency Band and the 1800 MHz Frequency Band) Regulations 2018 with the new Wireless Telegraphy (Licence Charges for the 900 MHz Frequency Band and 1800 MHz Frequency Band) Regulations 2025 as well as adding in the Wireless Telegraphy (Licence Charges for the 2100 MHz Frequency Band) Regulations 2025. Following the new Wireless Telegraphy (Licence Charges for the 900 MHz Frequency Band and the 1800 MHz Frequency Band) Regulations 2025, the Wireless Telegraphy (Licence Charges for the 900 MHz Frequency Band and the 1800 MHz Frequency Band) Regulations 2018, will fall away. Therefore, this change will ensure that mobile spectrum trades will continue to be prevented where there are outstanding fees due which should have already been paid under the Wireless Telegraphy (Licence Charges for the 900 MHz Frequency Band and the 1800 MHz Frequency Band) Regulations 2025. This will also extend the restriction to apply where there are fees due under the Wireless Telegraphy (licence Charges for the 2100 MHz Frequency Band) Regulations 2025.
- A3.5 We also propose to amend the Mobile Trading Regulations to omit Regulation 6(b)(i) and 6(c)(i) to remove reference to the Wireless Telegraph (Licence Charges) Regulations 2011. These regulations have been revoked and the regulations that replaced them do not set fees in respect of spectrum to which the Mobile Trading Regulations apply.
- A3.6 A draft of the proposed regulations is set out at Annex 1 and the general effect of these regulations is described in more detail in Section x of this document. Our impact assessments are set out in Annex 2.
- A3.7 Hard copies of this notice and the proposed regulations can be obtained from: ALF Review Team, Ofcom, Riverside House, 2A Southwark Bridge Road, London SE1 9HA Email: ALF.Review@ofcom.org.uk.
- A3.8 Comments or representations with respect to the proposed regulations are invited by **5pm on 12 September 2025**. Comments should be sent to the email address above. Following completion of the overall consultation process, Ofcom intends to make the final regulations as soon as practicable.

A4. Responding to this consultation

How to respond

- A4.1 Ofcom would like to receive views and comments on the issues raised in this document, by 5pm on 12 September 2025.
- A4.2 You can download a response form [here](#). You can return this by email or post to the address provided in the response form.
- A4.3 If your response is a large file, or has supporting charts, tables or other data, please email it to ALF.Review@ofcom.org.uk, as an attachment in Microsoft Word format, together with the cover sheet.
- A4.4 Responses may alternatively be posted to the address below, marked with the title of the consultation:
- ALF Review Team, Spectrum Group.
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA
- A4.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
- > send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files; or
 - > upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A4.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential)
- A4.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt of a response submitted to us by email.
- A4.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A4.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed at Annex 7. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.
- A4.10 If you want to discuss the issues and questions raised in this consultation, please email ALF.Review@ofcom.org.uk.

Confidentiality

- A4.11 Consultations are more effective if we publish the responses before the consultation period closes. This can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish responses on the Ofcom website at regular intervals during and after the consultation period.
- A4.12 If you think your response should be kept confidential, please specify which part(s) this applies to and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A4.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A4.14 To fulfil our pre-disclosure duty, we may share a copy of your response with the relevant government department before we publish it on our website.
- A4.15 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further in our Terms of Use.

Next steps

- A4.16 Following this consultation period, Ofcom plans to publish a statement in Q3 FY 2025/26.
- A4.17 If you wish, you can register to receive mail updates alerting you to new Ofcom publications.

Ofcom's consultation processes

- A4.18 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex 5.
- A4.19 If you have any comments or suggestions on how we manage our consultations, please email us at consult@ofcom.org.uk. We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.
- A4.20 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact the corporation secretary:

Corporation Secretary
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA
Email: corporationsecretary@ofcom.org.uk

A5. Ofcom's consultation principles

Ofcom has seven principles that it follows for every public written consultation:

Before the consultation

1. Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

During the consultation

2. We will be clear about whom we are consulting, why, on what questions and for how long.
3. We will make the consultation document as short and simple as possible, with an overview of no more than two pages. We will try to make it as easy as possible for people to give us a written response.
4. When setting the length of the consultation period, we will consider the nature of our proposals and their potential impact. We will always make clear the closing date for responses.
5. A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
6. If we are not able to follow any of these principles, we will explain why.

After the consultation

7. We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish the responses on our website at regular intervals during and after the consultation period. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

A6. Consultation coversheet

Basic details

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

Confidentiality

Please tick below what part of your response you consider is confidential, giving your reasons why

- | | |
|----------------------------------|--------------------------|
| > Nothing | ☐ |
| > Name/contact details/job title | ☐ |
| > Whole response | ☐ |
| > Organisation | ☐ |
| > Part of the response | ☐ |

If you selected 'Part of the response', please specify which parts:

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

Yes ☐ No ☐

Declaration

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom aims to publish responses at regular intervals during and after the consultation period. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

A7. Consultation question

Please tell us how you came across about this consultation.

- ☐ Email from Ofcom
- ☐ Saw it on social media
- ☐ Found it on Ofcom's website
- ☐ Found it on another website
- ☐ Heard about it on TV or radio
- ☐ Read about it in a newspaper or magazine
- ☐ Heard about it at an event
- ☐ Somebody told me or shared it with me
- ☐ Other (please specify)

Do you agree with our proposals to:

- amend the Mobile Trading Regulations to remove the requirement to pay any outstanding ALF instalment payments upfront before a trade?
- make the other updates to Regulation 6 of the Mobile Trading Regulations described in paragraphs 2.12-2.17?