



**Virgin Media O2 response to:**

**Expanding Access to Shared Spectrum:**

**Statement and further consultation on enhancing the Shared  
Access Licence Framework**

**September 2024**

## INTRODUCTION

Virgin Media O2 (“VMO2”) welcomes the opportunity to respond to Ofcom’s consultation on Expanding Access to Shared Spectrum.<sup>1</sup> Our response focusses on Ofcom’s specific questions.

## RESPONSE TO SPECIFIC QUESTIONS

Question 1: Do you have any comments on our proposal to make Medium Power licences (42 dBm EIRP, up to 10m height) commonly available in urban areas across most of the UK, for the 3.8-4.2 GHz and 1800 MHz bands?

We agree with the proposal.

Question 2: Do you have any comments on our proposed balancing measures:

- i) to continue to only grant Medium Power licences in the Greater London area (as defined in our mm Wave work) by exception, applying the ‘premises sterilisation’ test?

We agree with the proposal.

- ii) to apply a 100 MHz limit to the amount of spectrum a licensee can transmit at Medium Power in a particular urban area?

We agree with the proposal.

- iii) to apply a new price as part of this liberalisation, set at £160 per 10 MHz for Medium Power licences in urban areas?

We note Ofcom’s pricing position. We would recommend that Ofcom reviews its pricing at suitably regular intervals to ensure it is appropriate, whilst taking account of stakeholder feedback.

Question 3: Do you agree with our proposal to remove the TRR in relation to Low Power outdoor base stations in 3.8-4.2 GHz?

We agree with the proposal.

Question 4: In relation to our impact assessment, do you agree with our assessment of the potential impact of the further proposals we are making?

No comment.

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<sup>1</sup> <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/consultation-supporting-increased-use-of-shared-spectrum/associated-documents/statement-expanding-access-to-shared-spectrum.pdf>

Question 5: In relation to our equality impact assessment, do you agree with our assessment of the potential impact of the further proposals we are making on specific groups of persons?

No comment.

Question 6: In relation to our Welsh Language impact assessment, do you agree with our assessment of the potential impact of our further proposals on the Welsh language? Do you think our further proposals could be formulated or revised to ensure, or increase, positive effects, or reduce/ eliminate any negative effects, on opportunities to use the Welsh language and treating the Welsh language no less favourably than English?

No comment.

Question 7: Do you have any further comments on our proposals?

We have no further comments.