



Ofcom's Proposed Plan of Work 2024/25

Cellnex UK Response

February 2024

Overview of Cellnex UK

Cellnex Group

This response is submitted by Cellnex UK ([link](#)), part of Cellnex Group ([link](#)) which:

- Supports over 420 million mobile connections across Europe
- Operates >70,000 mobile sites today, which will grow to >130,000 by 2030
- Is Europe's leading neutral host mobile infrastructure provider, covering 12 countries: Austria, Denmark, France, Ireland, Italy, Netherlands, Poland, Portugal, Spain, Sweden, Switzerland and the UK
- Provides mobile infrastructure services, private and mission-critical networks, distributed antenna systems and small cells, and smart/IoT and innovative services
- Operates sixteen mission critical networks in Spain for emergency bodies to ensure public safety
- Has deployed forty private networks across Europe for enterprise applications
- Had an annual turnover of €3.5bn in 2022
- Is listed on the main sustainability indices, and evaluated by highly reputable international analysts such as CDP, Sustainalytics, FTSE4Good, MSCI and Standard Ethics

Cellnex UK

We are the trusted partner of all the major UK mobile network operators, hundreds of private businesses, the emergency services, as well as the UK Government, specifically Cellnex UK:

- Is the UK's leading independent wireless connectivity infrastructure company
- Operates >9,000 mobile sites today, which will grow to >13,000 by 2031
- Has deployed over 1,000 small cells to date
- Is a provider of private networks in campus and indoor environments
- Is an indoor mobile coverage provider, most notably in the Etihad stadium in Manchester
- Is deploying contiguous mobile coverage and capacity along the 81km Brighton to London Mainline and three major stations
- Has won three DCMS 5G competitions, working collaboratively with universities and start-ups to deliver 5G innovation
- Employs around 300 people across four major UK locations – Reading, Manchester, Scotland and Leamington Spa
- Has invested £6.1bn in the UK since 2016

Basis of Response

We have reviewed and commented on the elements of Ofcom's proposed plan of work for 2024/25 which are related to the services and sectors we currently provide to and those we envisage providing to in the future.

1. Cellnex UK Input

Cellnex notes the wide and diverse portfolio that Ofcom is now accountable for and as a consequence the expansive nature of its proposed 2024/25 work plan. Based on our business focus and areas of market participation, as described on the previous page, we make the following observations regarding the proposed 2024/25 workplan.

1.1. Internet we can rely on

Cellnex UK is supportive of the workplan Ofcom's has outlined for this area, though as per our response to *Ofcom's Work Plan 2023/24* we continue to note that the mobile value chain continues to undergo rapid evolution in terms of composition and participants alongside a revised government ambition detailed in the *Wireless Infrastructure Strategy*.

As a result we encourage Ofcom to continue to dedicate the required level to resource to its activities in the mobile network sector to ensure regulation keeps pace with industrial change and enable achievement of the target societal outcomes.

We would call out the following two items from this area of the proposed workplan as particularly significant in 2024/25:

- **Improved Mobile Coverage/Quality Reporting:** As per our response to *Ofcom's Future Approach to Mobile Markets* we continue to believe provision of higher quality and more accurate network performance information would deliver considerable benefits to consumers and industry. In the case of the later it would enable optimisation of shared infrastructure investment with associated economic and environmental benefit.
- **Vendor Diversification:** This remains critical for both public and private networks, 2024 needs to be a transformative year where activity moves beyond trial and integration testing into commercial deployment. Cellnex UK looks forward to supporting this by building on the work it is currently undertaking with SONIC Labs.

1.2. Enabling wireless services in the wider economy

We are also broadly supportive of Ofcom's approach in this area, though as detailed below we believe there are potentially three areas of activity which we believe are missing from the proposed 2024/25 work plan.

In terms of the items currently included in the workplan, we would highlight the following points:

- **1.4 GHz and 26 GHz Spectrum Release:** We are supportive of timely spectrum release, acknowledging the point regarding conclusion of the CMA process. As per our response to *Ofcom's Future Approach to Mobile Markets* and *Enabling mmWave Spectrum for New Uses* we continue to encourage Ofcom to consider whether the economic benefit of fees from one-off and ongoing spectrum charges would be greater if they were instead used to deploy networks and achieve economic multiplier impact.
- **Upper 6 GHz:** We encourage Ofcom to release this spectrum inline with the intent from WRC-23, acknowledging the point regarding conclusion of the CMA process.
- **Improving Spectrum Management Operational Capabilities:** Cellnex is supportive of activity to improve this, both as a direct user and also on behalf of the customers we support via our shared infrastructure. Accessing spectrum in an efficient and timely manner is a key step in achievement of network deployment and associated delivery of economic benefit,

During 2023/24 Ofcom commenced but did not conclude activity for which there appears to be no further work planned during 2024/25. We acknowledge this may be because Ofcom considers these activities work in progress/ongoing activity, however we note other 2023/24 activities which would also fall into this category have been detailed explicitly in the proposed 2024/25 workplan.

The three specific items we would highlight are:

- **Spectrum for the Utilities Sector:** As per our response to the Call for Input in 2023 there is an urgent need for allocation of spectrum to the Utilities sector, we would have expected a programme in 2024/25 to confirm the spectrum band/s and guidance on the timetable and process for release with the aim of achieving timely release in 2025.
- **Spectrum for Police Service Northern Ireland:** We see resolution of this via spectrum release as important to enable deployment of the next generation of public protection and disaster relief services to support citizens safety and health.

- **Annual Licence Fee Regime:** Ofcom was commissioned as part of the *Wireless Infrastructure Strategy* to undertake a review of this regime by the end of 2023. Following publication of Ofcom's findings on the 11th January 2024 we, like others in industry, are keen to understand any associated action that Ofcom envisages taking during 2024/25.

1.3. Concluding Points

As noted the UK mobile landscape continues to evolve rapidly.

Cellnex UK looks forward building on its existing relationship with Ofcom via further engagement during 2024/2025.