GSA - Global mobile Suppliers Association

Additional comments:

Question 1:Do you have any comments on Analysys Mason?s approach to quantifying the network cost savings and performance benefits?:

The analysis is both reasonable and balanced for the interests of stakeholders and users. The benefits of using 700 MHz spectrum for mobile services are well explained and are widely appreciated by all stakeholders. Spectrum in the 700 MHz range is currently used in 56 commercially launched LTE mobile broadband networks around the world, i.e. around 18% of commercially launched LTE networks, according to data published by GSA in July 2014.

Question 2:Do you have any comments on the other benefits we have identified including the likely magnitude or how they may be quantified?:

The points concerning international harmonisation of the 700 MHz spectrum band for mobile services use are well made and cannot be understated. 3GPP Band 28, otherwise known as the APT700 FDD band plan, has attracted strong support internationally in several countries across Asia, Oceania and Latin America and is calculated to represent over 2.2 billion population who could potentially be addressed by this band and benefit from large economies of scale driving lower user terminal costs, and greatly assisting international roaming. We agree that the proposal for the UK with Europe to align with the lower 2 x 30 MHz duplexer of band 28 brings the prospect of a common sub-1 GHz band plan across a significant part of the globe, estimated to be approaching 3 billion population. Consumers would consequently benefit even more from the enhanced scale economies deriving for production of terminals that would be built for the Asia Pacific market and Europe. With the first commercial APT700 service introductions already made in several countries, an ecosystem is now quickly growing. With the near global adoption of the APT700 band 28 spectrum configuration it is a crucial band for device manufacturers to support. GSA expects APT700 to be become a mainstream band.

Question 3:Do you agree with our assessment of the likely benefits of changing use of the 700 MHz band?:

Agreed.

Question 4:Do you have any comments on our analysis of the implications change of use of the 700 MHz band would have for the DTT platform?:

No further comment.

Question 5:Do you agree with our assessment of the likely costs of upgrading DTT transmission infrastructure?:

No further comment.

Question 6:Do you have any comments on our assessment of the timeframes within which it might be possible to complete a DTT replan?:

No further comment.

Question 7:Do you have any comments on our assessment of the loss of value from existing DTT services in case of change of use for the 700 MHz band?:

No further comment.

Question 8:Do you have any comments on our analysis of the implications of potential changes for DTT viewers and for the platform? Are there any effects that may be important to viewers that we should consider further?:

No further comment.

Question 9:Do you have any comments on our consideration of consumer information and support measures and on the factors we should focus on in the next stages of work?:

No further comment.

Question 10:Do you have views on the activities that Ofcom and other stakeholders could undertake now to help ensure that DTT equipment that consumers might buy in the coming years is as future-proof as possible?:

No further comment.

Question 11:Do you have any comments on our assessment of the impact change of use of the 700 MHz band would have on PMSE?:

No further comment.

Question 12:Do you have any comments on the mitigations for loss of access to the 700 MHz band including whether we have correctly identified the replacement bands suitable for further study and whether we have correctly identified actions that the PMSE industry could adopt to improve spectrum efficiency?:

No further comment.

Question 13:Do you have any comments on our assessment of the impact of the change of use of the 700 MHz band on the TVWS availability?:

No further comment.

Question 14:Do you agree with our use of the Spackman method for discounting both the costs and benefits of change of use?:

No further comment.

Question 15:Do you agree with our approach of estimating the cost of early replacement or should we be considering the full cost? Do you have any comments on how we have estimated the costs of early equipment replacement? :

No further comment.

Question 16:Do you agree with our overall assessment of the costs of change of use of the 700 MHz band?:

No further comment.

Question 17:Do you have any comments on our assessment of the impact of earlier or later change of use of the 700 MHz band?:

See answer to Question 19.

Question 18:Do you agree with our proposal that we should make the 700 MHz band available for mobile broadband?:

Agreed.

Question 19:Do you agree with our proposal that we should seek to implement this change at the earliest possible opportunity?:

Agreed. A decision by Ofcom to make the 700 MHz band available for use for mobile broadband services at the earliest opportunity would deliver the strongest and clearest signal to the market, including manufacturers, service providers, content providers and applications developers in the UK and internationally, for future planning and investment decisions, and assist development of the terminals ecosystem.

Question 20:If, as a result of this consultation, we decided to go ahead with the proposed changes, what factors and evidence should we take into account when considering whether to hold an auction near to the time of availability of the spectrum or earlier?:

See answer to Question 19.