

Dear Sir,

This submission concerns the management of spectrum.

I only heard about this consultation at a meeting on 26 March attended by representatives of DCMS so this reply is hurried.

Background.

I have been working on technology for digital access to disadvantaged and rural communities for 20 years. I was a member of the Broadband Stakeholder Group in the early 2000s and was involved in bidding on the auction for the 3.4GHz spectrum licence in 2003. This licence was won by a Chinese company who developed minimal services. A number of UK technology startups who could have used this spectrum to develop world beating products collapsed as a result.

Over this time I attended meetings at the then Radio Communications Agency about spectrum coordination and reuse, and at BEIS over how 5GHz spectrum should be licenced. It was successfully issued unlicensed and partly lightly regulated. These experiences enabled me to understand these issues at some depth.

Answers to questions.

I am pleased that the document brings new thinking to the management of spectrum and I agree with the ideas proposed.

I agree that the document is clear.

Discussion.

I support the IET's ideas over shared spectrum.

The charity commission has suggested that the provision of internet access can be a charitable activity, provided that the service is provided free to disadvantaged people. The precedent for this goes back several hundred years to when the provision of London's bridges was charitable since only carriages paid tolls and pedestrians crossed for free.

My current work includes establishing a charitable 'Community Benefit Society' under the 2014 Act. This enables the Society to issue tax free charitable bonds that can be used to fund digital infrastructure including spectrum licences. The society is regulated under charity law and can coordinate funding and spectrum access to commercial operators with the overriding test of 'public benefit'. This system releases Ofcom from the detail of regulating spectrum in small geographic areas, and should enable effective management of spectrum and equipment in underserved areas.

This proposal is intended to focus on providing universal access rather than involving areas where there is existing competition.

David Winder