

[§<] does not wish to make a formal documented submission to the CMA's Remedies Working Paper ('RWP'), however we note the following statement in the RWP under 1.68:

*“One example of the challenges is that the Parties do not own all of the network infrastructure they use, often using neutral hosts (or tower companies) which build passive infrastructure (such as towers and masts). The Parties, and not the CMA, would therefore need to negotiate approval from these third party infrastructure providers to allow a new MNO to enter.”*

This is a fundamental misunderstanding of how the TowerCo industry operates and how the industry actively facilitates new entrants. The TowerCo business model:

- Is based upon increasing lease up ratios by encouraging sharing
- Is heavily incentivised to agree attractive commercial terms with any new sharers
- Enables a significant proportion of network deployment to be achieved via colocation (i.e. installation on existing infrastructure)
- Dramatically reduces the cost of entry as compared to building new dedicated infrastructure and as a consequence also yields significant environmental benefits
- Invests and innovates in the deployment new shared infrastructure solutions to address network coverage and capacity challenges

TowerCo's are the opposite of a 'challenge', they are actually one of the most significant facilitators of market entry for a new MNO. This point should be reflected in any final remedies paper that the CMA publishes given its potential to be used as a reference document by others.

We note from a UK perspective [§<].