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At our appearance before the committee last week, we agreed to provide information about overseas experience with coverage and other obligations imposed on mobile network operators [MNOs].

Here are two examples, one where coverage obligations are being imposed, the other where they were proposed but dropped, but other means are being used to achieve the original objectives:

1. The policy [announced](#) for Singapore last October [full policy attached]. This is an example of an overseas market that has opted to impose rollout and performance obligations on MNOs obtaining valuable 5G spectrum at 3.5 GHz. The regulator, IMDA, is not using an auction – in essence, it is using a sophisticated ‘beauty contest’ or merit-based allocation process, although with price and financial capacity elements. IMDA has invited proposals from a closed group of four MNOs active in the Singapore market, which will be assessed on a set of differently weighted criteria. While these include price and financial capacity, the factor receiving the greatest weight will be network design and resilience. IMDA is offering two, large (100 MHz) blocks of 3.5 GHz spectrum and has invited proposals, including bids, for them from the four MNOs. The bids must exceed a minimum price set by the regulator, based on ‘national and international benchmarks and econometric modelling’. Successful bidders will be required to offer wholesale services to other MNOs and MVNOs in areas where they are using 3.5 GHz spectrum to deliver 5G services. The allocation process is on-going. As of this month, responses have been received and will be evaluated, with a decision foreshadowed mid-year.
2. UK communications regulator OfCom proposed coverage obligations for upcoming spectrum licences, including in the valuable 700 MHz band. However, in October 2019 it [announced](#) the auctions in question will now proceed without coverage obligations. This follows a deal between the UK government and four local MNOs to create a ‘shared rural network,’ with the goal of bringing 4G coverage to 95 per cent of the UK by 2025. The total investment is slightly over a billion pounds, with the government providing almost half of this sum.

I am also attaching an article about approaches to attaining multiple objectives in spectrum auctions that was published in the issue of *Telecommunications Policy* that I co-edited in 2017. You will see that 'use-it-or-lose-it' obligations are discussed at pp 370-1 and coverage obligations at pp 374-5.

Please let me know if you have questions.

Thanks very much again for the opportunity to appear before the committee.

Best wishes.

Jock