



Non-Confidential

Notice of proposal to make the Wireless Telegraphy (Mobile Repeater) (Exemption) Regulations 2022

Implementing Ofcom's decision to extend the range of static indoor mobile repeaters available for people to self-install without a licence

BT's response to the consultation published on 24 March 2022

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1 Introduction

BT has reviewed Ofcom's proposed regulations¹ that will implement its earlier decision to extend the scope of licence-exemption of mobile repeaters, and the proposal to make them technology neutral, so they include 5G technology.

BT has previously expressed some reservations over the proposal to facilitate 4G repeaters. Some of those same concerns arise with 5G repeaters in terms of unpredictable impact on the network which may affect other customers. Nevertheless, we acknowledge that Ofcom has decided to proceed to broaden the scope of the licence-exemption regulations and wants to include 5G.

We have provided our observation on the regulations in section 2 below, in terms of how they implement Ofcom's previous decision, and some additional considerations in relation to 5G.

2 Comments on the draft regulations

We suggest that the draft regulations 10(2) and 14(2) should be clarified to be clear that the -70dBm/MHz figure relates to EIRP. That would make it consistent with what is stated in the draft IR2102.

In relation to the proposal to include repeaters used to amplify 5G signals within the scope of the licence-exemption, we note that we currently use a non-standalone 5G architecture where a 4G signal is also needed for the 5G service. If repeaters are envisaged that only amplify a 5G signal that would be problematic for consumers, at least until a 5G-SA architecture is implemented and the relevant devices support that. The regulation for multi-operator mobile repeaters requires all of the 800/1800/2100MHz bands to be used, so this is perhaps more relevant to the provider specific repeaters.

We note, in relation to draft regulation 9, that EE is phasing out 3G technology, but understand that if UMTS signals are not provided by the MNO then the requirement to amplify the GSM signals will apply.

¹ https://www.ofcom.org.uk/_data/assets/pdf_file/0028/234199/wt-mobile-repeater-exemption.pdf

