

Mr. Michael Byrne
Guernsey Competition and Regulatory Authority
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Flo Connect Limited
Courtil de Vic
Maurepas Road
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14th August 2017

RE: Pan-Channel Island Consultation on Spectrum Awards in the 2.6 GHz Band

Dear Mr. Byrne,

Flo Connect Limited is happy for this consultation response to be published in full.

As you are aware Flo Connect Limited ('Flo') is an incorporated Guernsey company. The business is based on an IoT MNO model providing a platform for OEMs, IoT service providers, and MNOs.

Flo has been granted a mobile telecommunications licence in Guernsey. As part of the application process for this licence, Flo provided information to the GCRA which detailed its business plans and requirements for spectrum (letter from Flo to GCRA dated 24th May 2017 - which remains confidential) which should be read in conjunction with the responses provided below.

Please find below Flo's response to the consultation document.

Question 1: Respondent views are sought on the continued appropriateness or otherwise of the objectives to guide process and criteria for joint allocation of spectrum in the Channel Islands.

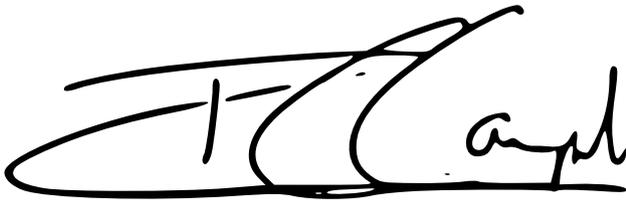
Flo broadly agrees with the appropriateness of the objectives for joint allocation of spectrum in the Channel Islands but only where this best serves the consumer. If better competition or faster roll out of new services could be achieved by separate allocations in each Bailiwick then Flo would support this.

Question 2: Respondents are invited to comment on, with supporting evidence and explanation, current and prospective demand for spectrum in the 2.6 GHz Band that CICRA should consider in making any spectrum recommendation to Ofcom.

Flo's business is based on an IoT MNO model (not a traditional voice mobile service) and will offer B2B services and not direct traditional mobile consumer services to the Channel Islands market and therefore it is not expected to impact directly on the existing Channel Islands mobile market.

- a) Flo will require 2 x 5Mhz slots in the 2.6GHz band to establish a test bed in Guernsey. Flo has no preference on which part of the 2.6GHz band is awarded as it can adjust its technology to fit, so the least in-demand spectrum would be acceptable. Licenced spectrum is required to fit its technical requirements and business plan.
- b) It is anticipated that the spectrum allocation will be required for the lifetime of the company to enable continuing development and deployment of new technology.
- c) The spectrum is required to enable real world testing for the roll out of existing and future technology.
- d) Flo plans to install transmission capability in the form of a single small mast / Femto cell with coverage of around 1-2 miles.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'I Campbell', written over a horizontal line.

Ian Cunningham Campbell

Director and Resident Agent
Flo Connect Limited