

To Whom it May concern

I am writing to comment on the proposed merger of Vodafone and Three. As the CIO at the UK's largest Gas Distribution network I have a long-established working relationship with Vodafone brought about through the historic mergers of Energis and Cable and Wireless who provided the telecoms service to National Grid, the previous owner of Cadent. We are supportive of the proposed merger as we believe it will support our future technology ambitions, which are based on increased automation across our mobile phone and Internet of Things estate.

The ability to switch services between mobile suppliers is very fluid, with provisions being made for both consumers and businesses to move from one provider to another via automated provision of PAC codes etc. As a business with a substantial Fieldforce we are keen to ensure that there is continued competition and incentive for the main providers of mobile services such that they deliver value for money. We are however, concerned about the coverage of the network and investment in the upgrade to 5G, not only from the perspective of covering our mobile handsets but also our IoT coverage which provides services for Critical National Infrastructure.

We have recently been through a regulated procurement event for our mobile phone services, and we received only three credible bids, all of which were very similarly priced and offered us similar services. I don't believe that the merger of Three and Vodafone will result in increased costs to the consumer as the service is considered to be a consumable that is easy switched out with little to no impact to our operations.

We are keen to ensure that the mobile network is fully developed and the latest in 5G technology is rolled out across the UK where we operate as this will improve our offering to our end customers and allow us to adopt innovative technology to drive more efficient and safe delivery of gas related services. The cost of upgrading the network is significant, much higher than the rollout of 4G, and to be able to deliver services at scale a merger of Three and Vodafone would support the ambition to have competitive 5G services across the UK. It will also allow movement away from Openreach to deliver the final mile services for fibre as the combined coverage of the Three and Vodafone estate will mean greater penetration of a consolidated fibre offering.

It would be reassuring to know that the considerations of the CMA in this matter are broader than purely mobile phone services and it considers the impact on the ability of the UK to be served with the best possible 5G network as the role of communications in driving an overall competitive and secure economy will only grow exponentially. An expedited removal of 3G services will also support a significant reduction in the carbon footprint of the communications network and the combined investment of both companies will drive this outcome faster.

Regards

Dr Kate Jones
Chief Information Officer