

Fra: Compliance Norway <compliance@lyca-mobile.no>
Sendt: onsdag 26. august 2026 08:15
Til: Marit Mathisen; Nasjonal kommunikasjonsmyndighet (firmapost@nkom.no)
Kopi: Inger Vollstad; Kenneth Olsen; Satheeshwaran Udhayakumar; Marit Mathisen
Emne: RE: Informasjon om utsatt høringsfrist

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Dear Sir/Madam,

Please accept our apologies for submitting our response after the consultation deadline. Due to internal coordination and finalisation of our comments, we were unable to submit our response within the specified timeframe.

Nevertheless, we would appreciate it if Nkom could kindly consider the below response as part of the consultation process, should this still be possible.

Lycamobile Norway is an independent mobile virtual network operator without its own radio access network and is accordingly wholly dependent on wholesale access to a host mobile network in order to compete in the Norwegian retail market. We respond to Nkom's question as to whether providers without their own networks will continue to obtain access on terms allowing effective competition. Our position is that this question cannot be answered by reference to the availability of a wholesale agreement alone. Effective access depends on the commercial and technical terms on which capability is actually delivered including pricing structure and volume commitments, the extension of network functionality to MVNO subscribers, the timing of that extension relative to host retail availability, and migration rights. Where the number of independently controlled radio networks falls from three to two, and where only one host carries a regulated access obligation, the practical set of alternatives available to an independent operator contract correspondingly. We therefore ask Nkom to assess the transaction's effect at the wholesale layer, and should it conclude that conditions are warranted, to frame those conditions by reference to the commercial and technical viability of access rather than to its nominal availability. Any such condition should be available to any provider meeting objective criteria.

Kind regards,
Lakshi Woods
