Your response

Question	Your response
Question 1: Do you have any comments on our proposals to gather additional antenna parameters, and would you prefer Ofcom to specify a small number of antenna pattern 'envelopes' or for users to provide details of the specific antenna parameters in use for Ofcom to assess? Please provide reasons for your views.	Confidential? – No Ofcom specifying a small number of antenna pattern 'envelopes' could simplify the process for users as they would only need to select the appropriate envelope for their use case. It could also make it easier for Ofcom to manage and assess the impact on the spectrum. However, this approach might not capture the full diversity of antenna parameters in use, potentially limiting innovation and flexibility. Users providing details of the specific antenna parameters in use for Ofcom to assess could allow for greater flexibility and innovation, as users are not limited to a small number of predefined options. It could potentially lead to more efficient use of the spectrum, as users could tailor their parameters to their specific needs. The best approach could depend on factors such as the diversity of use cases, the capacity of users to provide detailed parameters, and Ofcom's capacity to assess a potentially large number of different parameters. It might also be worth considering a hybrid approach, where users can either select a predefined envelope or provide specific parameters. This could potentially offer a balance between simplicity and flexibility.
Question 2: Do you have comments on the suggested approach to enable user-led coordination in certain circumstances?	No comments.
Question 3: Do you have any comments on our proposal to increase the power level of our Low Power product by 3dBm in the 3.8-4.2 GHz band?	Increasing the power level of the Low Power product by 3dBm effectively doubles the power. This could potentially improve the range and signal quality, which could reduce the total cost of a Private 5G solution, as less nodes would be required to cover a specific area.

	In our opinion, this is a great way to accelerate the adoption and increase the scale of deployments of 5G technology in the country, with all the benefits that will bring.
Question 4 Do you have any comments on our proposal to remove the requirement for licensees holding a Low Power 3.8-4.2 GHz licence to keep a record of the address at which mobile terminals connected to an indoor base station will be used?	Removing the requirement for licensees to keep a record of the address at which mobile terminals connected to an indoor base station will be used could simplify the administrative processes for licensees, potentially reducing their operational costs and making it easier for them to comply with licensing requirements. In our opinion, this could also help to accelerate the adoption and increase the scale of deployments of 5G technology in the country.
Question 5: Do you agree with our proposals to assume synchronisation between users, and coordinate base station to terminal instead of base station to base station in the 3.8-4.2GHz band? If no, please explain how other measures could increase sharing of the band.	We agree with the proposals to assume synchronization between users and coordinate base station to terminal.
Question 6. Please indicate whether you support our preferred option of coordination at -88 dBm/20 MHz (based on I/N of + 3dB, at 1.5m) or a more conservative alternative of -91 dBm/20 MHz (based on I/N of 0dB at 3m), with reasons for your view.	We support the preferred option of coordination at -88 dBm/20 MHz (based on I/N of + 3dB, at 1.5m), as it allows higher access to the spectrum. We see it as another positive change that could contribute to accelerate the adoption and increase the scale of deployments of 5G technology in the country.
Question 7: Do you agree with our proposals for an increase in BEL in 3.8-4.2GHz? If no, are there alternatives which you consider could better achieve similar results?	We agree with the proposal for an increase in BEL in 3.8-4.2GHz.
Question 8: Do you agree with our proposal that adjacent band protection for Shared Access users is in future limited to considering only the first 5 MHz above and below UK Broadband assignments?	We agree with the proposal that adjacent band protection for Shared Access users is in future limited to considering only the first 5 MHz above and below UK Broadband assignments.
Question 9: Do you agree with our assessment that, in circumstances where localised shortages of spectrum have occurred, pricing can be used to influence requested spectrum amounts?	We agree with the assessment that, in circumstances where localised shortages of spectrum have occurred, pricing **could** be used to influence requested spectrum amounts.
Question 10: Do you agree that we should take measures to reflect the impact of bandwidth, power levels and urban/rural	We agree that Ofcom **could** take measures to reflect the impact of bandwidth, power levels

location in our pricing approach for the 3.8-4.2 GHz band? Do you think there are other factors we should be taking into account?	and urban/rural location in the pricing approach for the 3.8-4.2 GHz band.
Question 11: How do you consider the illustrative prices would impact your spectrum requirements and future deployment plans in the 3.8-4.2 GHz band? Please provide evidence in support of your view.	The proposed increase in the price of the shared access spectrum licenses could have a negative impact on Airspan and its customers. Airspan is a leading provider of 5G solutions for private networks, using the shared access bands to deliver secure, reliable, and customisable wireless connectivity for various industries and applications. The higher fees would increase the overall cost of deploying and operating private 5G networks in the UK, which could discourage potential customers from adopting this innovative technology. Furthermore, the higher fees could create an unfair advantage for unlicensed alternatives, such as Wi-Fi, which do not have to pay for spectrum access. This could undermine the benefits of 5G for the UK economy and society, such as increased productivity, efficiency, and competitiveness. Therefore, we urge to reconsider the proposal and maintain the current pricing scheme for the shared access spectrum licenses, which is more conducive to fostering wireless innovation and enabling local 5G solutions. From an ecosystem point of view, so far, all our customers and partners deploying or planning Private 5G networks in the UK have preferred the 100 MHz channel bandwidth. This is in line with what we see in other markets where the regulators have made n77 spectrum available for private applications. Supporting the n77 lower channel bandwidths (the ones proposed keeping the same fee) is not aligned with the requirements coming from other Private Networks markets, therefore not currently considered for n77 future support by most of the 5G technology providers, including Airspan.
Question 12: Do you have any comments on our proposals to clarify the circumstances in which exceptions are available, the tests we will apply, and how this supports user flexibility outside our overarching rules?	No comments.
Question 13: Do you agree with our overall approach based around refining our existing coordination framework for Shared Access, whilst monitoring future opportunities for	We agree with the overall approach based around refining the existing coordination framework for Shared Access, whilst monitoring future opportunities for more user

more user led and outcomes led coordination where evidence suggests it would be of benefit?	led and outcomes led coordination where evidence suggests it would be of benefit.
Question 14: Do you agree with our assessment of the potential impact on specific groups of persons?	We agree with the assessment of the potential impact on specific groups of persons.
Question 15: Do you agree with our assessment of the potential impact of our proposal on the Welsh language? Do you think our proposal could be formulated or revised to ensure, or increase, positive effects, or reduce/eliminate any negative effects, on opportunities to use the Welsh language and treating the Welsh language no less favourably than English?	We agree with the assessment of the potential impact of the proposal on the Welsh language. We do not think the proposal could be formulated or revised to ensure, or increase, positive effects, or reduce/eliminate any negative effects, on opportunities to use the Welsh language and treating the Welsh language no less favourably than English.
Question 16: Do you have any other comments on the proposals set out in this document?	No other comments.

Please complete this form in full and return to sharedaccessresponses@ofcom.org.uk.