

December 8, 2016

DSA Submission in Response to Ofcom Consultation on 3.6-3.8 GHz

The Dynamic Spectrum Alliance (DSA) is a global organization advocating for laws and regulations that will lead to more efficient and effective spectrum utilization. Our membership spans multinationals, small-and medium-sized enterprises, and academic, research, and other organizations from around the world, all working to create innovative solutions that will increase the amount of available spectrum to the benefit of consumers and businesses alike.

DSA's primary goals are to close the digital divide globally. We believe this can be achieved by reducing the cost of deploying last-mile wireless networks, freeing up an ample supply of spectrum for innovative uses, enabling the Internet of Things ("IoT") and other forward-looking applications.

DSA is pleased to file a submission in this consultation.¹ Our overarching view is that spectrum allocation should optimise the efficient use of spectrum, and spectrum sharing arrangements are well-suited to provide material benefits. With this focus in mind, DSA's response is solely to the question that addresses coexistence and sharing.

"Question 5: Do you agree with our assumptions, methodology, and conclusions with regards to potential coexistence between mobile and existing fixed links and satellite earth stations? Please refer to annex 5 for further details. "

DSA's response: The assumptions and methodology have produced conclusions which suggest that a separation distance of up to 145km may be required between incumbent users and a mobile base station in order that undue interference can be avoided. Whilst this may be

¹ Ofcom consultation – Improving consumer access to mobile services at 3.6 to 3.8 GHz, published 06 October 2016.

realistic in an analysis based on an extreme worst case scenario, we would encourage further consideration with the aim of identifying practical measures which will preserve some or all of the existing applications and investments while enabling the deployment of new mobile services in the same band. Ofcom has led in Europe on its coexistence work, in particular with the TVWS framework, and we encourage Ofcom to adopt a similar, collaborative approach on this 3.6 to 3.8 GHz band (and to other spectrum sharing options identified in the future), because this could yield opportunities and benefits to existing and new users which outweigh a more simplistic re-allocation.

We ask Ofcom to ensure that its expertise and resources are directed towards looking for ways to optimise the efficient use of spectrum by balancing the spectrum needs of all users, both incumbents and new entrants.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul Garnett". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Paul Garnett

Chairman

Dynamic Spectrum Alliance