

Your response

Question	Your response
<p>Question 1: (Section 2) Do you have any comments on our assessment of potential use cases, demand and deployment strategies for new uses of mmWave spectrum?</p>	<p>Confidential? – N</p> <p>SpaceX appreciates the opportunity to participate in this important proceeding and looks forward to working with Ofcom to maximize the value of millimetre wave spectrum for consumers across the United Kingdom, including for essential next-generation satellite services.</p> <p>SpaceX requests that Ofcom consider the following issues when assessing use cases, demand and deployment strategies for millimetre wave spectrum:</p> <ul style="list-style-type: none">• SpaceX’s network uses gateway earth stations in frequency bands (27.5-30 GHz) immediately adjacent to the upper portion of the 26 GHz band. These earth stations are essential to provide the backhaul for high-speed, low-latency satellite broadband connectivity for UK consumers and will continue to be essential as SpaceX deploys its next-generation infrastructure to serve more people in more places.• To ensure that satellite broadband consumers can continue to benefit from this essential spectrum, Ofcom should adopt appropriate technical and operational rules—such as out-of-band limits and licence conditions—so that prospective mobile users of the 26 GHz band do not interfere with satellite operations in the 27.5-30 GHz range. By striking this careful balance, Ofcom can ensure all UK consumers and businesses have access to broadband connectivity in even the farthest reaches of the country.

<p>Question 2: (Section 2) Do you have any comments on our proposed overall approach to mmWave spectrum (including our aim to make the 26 GHz and 40 GHz bands available for new uses on the same or similar timeframe)?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>
<p>Question 3: (Section 3) Do you agree with our approach of specifying high and low density areas in the UK, and authorising new uses differently in those areas?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>
<p>Question 4: (Section 3) Do you agree with our overall authorisation approach in high density areas for the 26 GHz band (i.e. to grant Shared Access licences on a first come, first served basis for the bottom 850 MHz of the 26 GHz band, (24.25-25.1 GHz), and to auction citywide licences for the rest of the 26 GHz band (25.1-27.5 GHz))?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>
<p>Question 5: (Section 3) Do you agree with our overall authorisation approach in low density areas for the 26 GHz band (i.e. to grant Shared Access licences on a first come, first served basis)?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>
<p>Question 6: (Section 3) Do you agree with adopting a similar approach to authorising the 40 GHz band as our proposals for the 26 GHz band, if we were to decide to re-allocate the 40 GHz band?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>
<p>Question 7: (Section 4) Do you agree with our proposed methodology for identifying and defining high density areas?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>
<p>Question 8: (Section 4) Do you agree with our proposed cut-off point of 40 high density areas?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>

<p>Question 9: (Section 5) Do you agree with our proposal to clear the fixed links in and around high density areas from the 26 GHz band?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>
<p>Question 10: (Section 5, Annex 8) Do you agree with our estimates of the cost of migrating fixed links into alternative spectrum bands?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>
<p>Question 11: (Section 6) Do you agree with the proposed approaches we have outlined to manage coexistence between new 5G users and the different existing users in the 26 GHz band? In particular, do you have any views on our proposals to limit future satellite earth stations in this band to low density areas only, and to end access to this band for PMSE users with five years’ notice?</p>	<p>Confidential? – N</p> <p>As above, SpaceX urges Ofcom to proceed with caution—and sufficient safeguards—when considering whether and how to permit 5G mobile use in the upper 26 GHz band.</p> <p>SpaceX urges Ofcom to adopt appropriate technical and operational rules that protect satellite customers in the 28 GHz band from mobile emissions in the 26 GHz band. To that end, SpaceX proposes establishing out-of-band emission limits, guard bands, licence conditions and similar restrictions to protect co-primary satellite services in the 27.5-30 GHz range from harmful interference.</p> <p>SpaceX respectfully requests that Ofcom not limit future satellite earth stations in the 26 GHz band to low-density areas. While next-generation satellite services are essential for consumers in low-density areas, they are also increasingly important for consumers in higher density areas. Access to both low- and high-density areas will provide satellite operators with the flexibility necessary to meet evolving consumer needs.</p>
<p>Question 12:(Section 7) Do you agree with our initial assessment on which option for enabling the 40 GHz band for new uses would best achieve our objectives?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>

<p>Question 13: (Section 7, Annex 8) Do you agree with our analysis of the impact on existing 40 GHz licensees, including our estimates of the cost of moving fixed links under the options involving revocation (options 2, 3 and 4)?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>
<p>Question 14: (Section 8) Do you have any comments on our high-level Shared Access proposals (including technical and non-technical licence conditions and proposed approach to setting fees)?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>
<p>Question 15: (Section 8) Do you agree with the overall approach we have set out to coordination and coexistence between new Shared Access users in the 26 GHz band and existing users?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>
<p>Question 16: (Section 9) Do you have any comments on our initial thinking in relation to auction design?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>
<p>Question 17: (Section 10) Do you have any comments on the licence duration options we have considered in this section for new licences for the 26 GHz and 40 GHz bands that we would auction?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>
<p>Question 18: (Section 11) Do you agree with our assessment of potential competition concerns and that it may be appropriate to impose a competition measure such as a ‘precautionary cap’?</p>	<p>Confidential? – N</p> <p><i>No comment.</i></p>

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