

Your response

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Question 1: Do you agree with our proposed set of 88 high density areas for 6 GHz authorisation? If you disagree, please provide your reasoning and evidence.	Confidential? – N Apple broadly supports Ofcom’s proposed use of defined high-density areas for future mobile authorisation. A geographically targeted model is proportionate and recognises that demand for high-power mobile use in Upper 6 GHz is likely to arise first in dense urban and transport locations rather than nationwide. This approach can help avoid unnecessary restrictions on alternative users, including Wi-Fi and fixed services, in areas where mobile demand is limited or uncertain. Apple would encourage Ofcom to ensure: • boundaries remain practical, transparent and easy to administer • future review mechanisms exist if demand patterns materially change • geographic definitions do not unintentionally constrain opportunistic or shared access outside areas of demonstrated mobile need Overall, we consider this approach more efficient than nationwide exclusive licensing.
Question 2: Do you agree with our proposal to clear fixed links from the Upper 6 GHz band in and around high-density areas, and to leave the band open to new fixed link licence applications outside of high-density areas, subject to coordination?	Confidential? – N Apple broadly supports Ofcom’s targeted approach to clearing fixed links in and around high-density areas where this is necessary to enable future mobile deployment, while allowing continued use elsewhere subject to coordination. A targeted clearance model appears more proportionate than nationwide revocation and better aligned with efficient spectrum management principles. However, Apple encourages Ofcom to: • prioritise migration to alternative bands or fibre solutions where feasible • preserve opportunities for continued fixed use where coexistence is demonstrably possible • avoid over-clearance beyond areas of realistic mobile deployment • maintain flexibility to support future Wi-Fi or shared-use frameworks outside mobile priority zones

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Question 3: Do you agree with the approach we have set out to identify the links which will be affected by the proposed revocation?	Confidential? – N Apple recognises the need for robust technical analysis to identify links genuinely incompatible with future use. We support an evidence-based methodology using realistic assumptions rather than overly conservative modelling that could result in unnecessary clearance. We encourage Ofcom to ensure that: • assumptions reflect real-world deployment patterns • mitigation techniques and practical engineering solutions are considered • affected parties have opportunity to challenge site-specific outcomes • methodologies remain technology neutral and adaptable as standards evolve
Question 4: Do you agree with our proposal to remove access to the frequencies 7110–7125 MHz for PMSE use, but to retain the option of allowing users to “borrow” spectrum from the Upper 6 GHz band for occasional major events?	Confidential? – N Apple understands Ofcom’s objective of simplifying future mobile use in the upper edge of the band and supports proportionate reforms to PMSE access where alternative spectrum remains available. At the same time, PMSE delivers important economic and cultural value. Any transition should therefore: • provide clear notice periods • preserve flexibility for exceptional events • rely on coordination mechanisms where practical • avoid creating unnecessary long-term underutilisation Apple notes that future decisions around 7125 MHz and above may also interact with international developments, including WRC-27 Agenda Item 1.7.
Question 5: Do you agree with our proposal to require mobile base stations to protect RAS usage of the band at the levels specified?	Confidential? – N Apple supports appropriate protection of Radio Astronomy Service operations and recognises the scientific value of these services. Targeted, evidence-based protections can coexist with wider consumer connectivity objectives where they are proportionate, geographically focused, and technically justified. Apple encourages Ofcom to: • apply site-specific protections where possible • minimise unnecessary nationwide constraints • review requirements periodically as technologies evolve • ensure measures are no more restrictive than required

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Question 6: Do you have any comments on how we should manage co-existence between mobile and any other users in the Upper 6 GHz band (i.e., RAS, EESS, SRDs, FSS and MOD use)?	Confidential? – N Apple supports Ofcom’s continued work to ensure coexistence with incumbent and adjacent-band users through proportionate technical rules. In particular: Satellite / EESS / FSS Apple supports internationally harmonised protections that avoid unnecessary UK-specific divergence where global solutions already exist. MOD / Government users Site-specific and localised coordination is generally preferable to broad exclusion zones. Overall, coexistence measures should preserve innovation while ensuring protection of incumbents.
Question 7: Do you have any comments on our assessment of the impacts of our proposals (to the extent not covered by previous questions)?	Confidential? – N Apple welcomes Ofcom’s impact assessment and encourages continued recognition of the significant economic and consumer benefits associated with Wi-Fi and licence-exempt ecosystems. In practice, indoor connectivity is heavily dependent on the combination of fibre backhaul and Wi-Fi distribution. This architecture carries a substantial share of UK broadband traffic and underpins homes, SMEs, schools, healthcare settings and enterprise environments. Accordingly, assessments of Upper 6 GHz policy should fully account for: • productivity gains from Wi-Fi capacity expansion • consumer surplus from lower-cost connectivity • innovation enabled by open ecosystems • enterprise digital transformation • competition benefits from complementary fixed/mobile infrastructure
Question 8: Do you have any comments on our Equality impact assessment?	Confidential? – N Apple agrees it is important to consider equality impacts. Affordable, high-performance Wi-Fi connectivity can support digital inclusion by improving access to education, remote working, healthcare, and public services, particularly for households where mobile-only solutions may be less suitable or more expensive for high-volume indoor use.

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	Spectrum policy should therefore support a range of complementary technologies that collectively improve inclusion outcomes.
Question 9: Do you have any comments on our Welsh Language impact assessment?	Confidential? – N Apple has no comment.
<u>Closing Statement</u> Apple welcomes Ofcom’s continued leadership in developing a pragmatic and innovation-friendly framework for the Upper 6 GHz band. We support approaches that maximise efficient spectrum use, promote competition, and recognise the complementary roles of fibre, Wi-Fi, mobile and satellite connectivity. The Upper 6 GHz band offers a valuable opportunity to strengthen UK digital infrastructure through a balanced model that supports both licensed mobile capacity and licence-exempt Wi-Fi innovation. We encourage a balanced framework that: • enables future mobile capacity where genuinely needed • preserves strong opportunities for Wi-Fi innovation and shared access • protects incumbent users proportionately • supports UK competitiveness • remains adaptable to future international developments, including WRC-27 outcomes	