

Introduction

Cisco Systems, Inc. appreciates the opportunity to provide these comments in response to Ofcom's consultation, *"Expanding access to the 6 GHz band for mobile and Wi-Fi services."* As a leading global provider of networking technologies with a significant footprint in the United Kingdom, Cisco remains committed to supporting the UK's mission to foster a world-class digital infrastructure that drives economic growth, productivity, and innovation.

Ofcom's latest proposals represent a pivotal moment for the future of wireless connectivity. As the world enters the AI era, spectrum policy has become competition policy. Deterministic Wi-Fi capabilities will be mission critical to the use of artificial intelligence, with half of all AI traffic traveling over enterprise Wi-Fi networks in the next three years. By taking decisive action to authorise Wi-Fi operations in the Upper 6 GHz band, the UK is once again asserting its position as a global leader not only in spectrum policy, but in promoting the UK's broader national interest in competing in this new era. Ofcom's proactive stance is being closely monitored by international regulators and industry stakeholders across the European Union, Latin America, Asia, and beyond. As these administrations prepare for the World Radiocommunication Conference in 2027 (WRC-27), they are looking to the UK's framework as a critical case study in how to effectively balance the coexistence of high-performance mobile services and licence-exempt Wi-Fi.

The UK's leadership is particularly timely. As noted above, Cisco data shows that half of all AI traffic will travel over enterprise Wi-Fi networks in the next three years. Our data further shows that AI-related traffic growth across enterprise networks could increase by nearly 9x, driven by autonomous task execution by AI agents and inference-heavy workflows. These findings reflect the evolution of Wi-Fi from a convenience feature to a strategic growth engine for global enterprises. The "wireless AI paradox"—where artificial intelligence is simultaneously the leading driver of wireless return on investment and the greatest source of escalating operational and security risks—demands a regulatory environment that prioritises stability, global alignment, and the efficient use of spectrum. Cisco's new website – "Unlocked: The Power of 6 GHz" – showcases customer stories from a variety of industries around the world demonstrating how 6 GHz access is critical to their success.¹

Cisco commends Ofcom for its pragmatic, phased approach. By implementing a clear, priority-based band split and establishing stable high-density areas, the UK can unlock the "multiplier effect" of wireless investment. This approach not only addresses the immediate connectivity needs of UK enterprises—who are increasingly reliant on 6 GHz spectrum to scale AI workloads and high-bandwidth applications—but also provides a scalable blueprint for other nations to follow.

We look forward to continuing our collaboration with Ofcom as it refines these proposals. Cisco remains dedicated to ensuring that the UK's approach to the Upper 6 GHz band not only secures its own digital future but also serves as a successful, evidence-based model for the rest of the world.

Question	Your response
Question 1: Do you agree with our proposed set of 88 high density areas for 6 GHz authorisation? If you	Though reasonable minds may disagree on the assumptions about future mobile and Wi-Fi data usage forecasts in these high-density areas, Cisco generally supports Ofcom's process for deriving its proposed set of 88 high-density areas. We see these proposals as a

¹ Cisco, "Unlocked: The Power of 6 GHz," <https://www.cisco.com/c/en/us/about/government-affairs/unlocked-the-power-of-6-ghz.html>.

Question	Your response
disagree, please provide your reasoning and evidence.	pragmatic framework to provide the investment certainty requested in our March 2026 consultation response in this proceeding. As the millimetre wave licensing process has shown, for these additional mobile capacity bands this approach represents a significant improvement over alternative models like nationwide licensing, which would be inefficient and costly for incumbent users in rural areas and unnecessary in suburban areas where 3.5 GHz capacity is sufficient. Ofcom’s approach successfully captures mobile capacity demand while minimising the regulatory footprint, ensuring that spectrum is allocated where it is most needed without imposing unnecessary burdens on portions of the UK that are unlikely to see any 6 GHz mobile deployments. The 88-area approach provides a stable, defined map that allows enterprises to plan their next-generation Wi-Fi deployments with confidence, knowing exactly where they need to integrate Automated Frequency Coordination (AFC) functionality and where they can operate with more flexibility. Crucially, this framework facilitates "early access" for licence-exempt use of the mobile-priority portion of the band. By allowing Wi-Fi devices to operate under AFC control in these 88 areas before the deployment of mobile networks, Ofcom avoids this vital spectrum sitting idle while awaiting the mobile rollout expected no sooner than 5 years from now, based on the agency’s proposed notice period for incumbent users. This early access is essential for UK enterprises to begin scaling AI-driven applications and high-bandwidth workloads immediately. According to Cisco’s <i>State of Wireless 2026</i> global report and its dedicated <i>United Kingdom Factsheet</i>², Wi-Fi has become a "strategic growth engine" for the UK, with 81% of UK organisations reporting operational efficiency gains and 77% reporting positive revenue impacts from wireless investments. To unlock this "multiplier effect"—where strategic wireless investments deliver compounding returns across the enterprise—UK organisations require a regulatory environment that promotes stability.

² Cisco, “State of Wireless 2026 Report” (May 2026) (*State of Wireless Report*), <https://www.cisco.com/site/us/en/products/networking/wireless/state-of-wireless-report/index.html>; Cisco, “State of Wireless 2026: United Kingdom Factsheet” (May 2026) (*UK State of Wireless Factsheet*), <https://www.cisco.com/c/dam/en/us/products/wireless/state-of-wireless-report/cisco-state-of-wireless-united-kingdom-factsheet.pdf>.

Question	Your response
	While we agree with Ofcom’s framework in principle, we also note the following considerations: 1. Balancing Stability with Accuracy Ofcom notes that it expects the list of high-density areas to be "relatively stable over time" and does not expect to amend them at a later date.³ While Cisco welcomes this commitment to stability—which is essential for the multi-year capital investment cycles of our enterprise customers—it places a high burden of accuracy on the initial designation. For our enterprise customers—such as large-scale manufacturing hubs, hospitals, and educational campuses—the requirement to use AFC systems is a significant technical and administrative commitment. If a facility is located within a "high-density" zone but the local MNO has not deployed 6 GHz services, the enterprise is effectively subject to regulatory constraints without a corresponding mobile coexistence need. Our <i>State of Wireless 2026</i> research shows that 82% of UK organisations forecast rising wireless budgets over the next four to five years. If the 88 high-density areas are defined too broadly or remain static despite a lack of actual mobile 6 GHz deployment, they will unnecessarily restrict Wi-Fi capacity. Given the industry's rapid upgrade cycle—Cisco telemetry shows a 60% increase in 6 GHz clients going live in 2025 and a 23% increase in Wi-Fi 6E/7 access point deployments in the second half of 2025—it is vital that these boundaries accurately reflect actual, rather than theoretical, mobile demand. Ofcom states that it expects mobile deployments in the 6 GHz band to begin no earlier than 2030.⁴ To ensure that these 88 areas continue to serve the goal of "optimal use of spectrum," Cisco recommends that Ofcom implement a formal, periodic review mechanism for these boundaries. If the spectrum is not licensed at auction or the mobile deployment does not materialise in a specific zone within a reasonable timeframe (e.g., 24–36 months) after Ofcom makes the spectrum available, there should be a clear pathway to relax the AFC-only requirement for Wi-Fi. This would ensure that spectrum is not "locked" behind regulatory barriers in areas where the mobile demand does not justify the exclusion of licence-exempt use.

³ See Ofcom Consultation at note 7.

⁴ See Ofcom Consultation at paras. 2.1 and 5.11. As noted earlier, however, with Ofcom’s proposed five-year notice period to incumbents, it is more likely that deployments will only begin in 2031 at the earliest.

Question	Your response
	2. Leveraging Future Sharing Mechanisms Ofcom suggests that spectrum sharing may be further improved through mechanisms like "enhanced sensing" as part of the European harmonisation process, which may eventually allow a wider range of devices into the mobile-priority portion of the band.⁵ Cisco strongly encourages Ofcom to accelerate the development of these enhanced sharing mechanisms. The <i>UK State of Wireless 2026 Factsheet</i> identifies that 98% of UK organisations report intensifying operational complexity, with 35% of IT teams receiving over 50 wireless support tickets per week. If these sharing technologies can be deployed, they could serve as a valuable "safety valve" for the 88 high-density areas, reducing the manual burden on IT teams by allowing Wi-Fi to operate in mobile-priority zones where mobile deployment is sparse or does not penetrate indoor areas. Cisco is committed to working with Ofcom and other UK stakeholders to continue development of these technologies. We recommend that Ofcom treat these sharing mechanisms not just as a future possibility, but as a core component of its 6 GHz strategy. 3. The Imperative of 6 GHz for Enterprise AI Spectrum policy has become global competitiveness policy. Our <i>State of Wireless 2026</i> report highlights that the 6 GHz band is now a prerequisite for advanced enterprise operations: 46% of organisations use 6 GHz Wi-Fi to solve capacity and congestion issues, 32% to enable high-bandwidth applications, and 31% to support AI workloads.⁶ Indeed, enterprises are already relying on Wi-Fi to leverage AI capabilities and compete globally. Organisations already deploying 6 GHz show almost double the rate of AI application and workload adoption (45%) compared to non-adopters (26%). Cisco predicts that <u>50 percent</u> of AI-related traffic will travel over enterprise Wi-Fi networks in the next 3 years.⁷ Our data further predicts that AI agents and inferencing could

⁵ Ofcom Consultation at note 3.

⁶ This was recently illustrated at the BottleRock music festival in California, which saw nearly 50 percent of almost 30,000 clients connect to 6 GHz over a three-day event, an 4x percent increase from the previous year. Matt Swartz and Kyle Prins, "The Less Obvious Headliner at BottleRock," (June 18, 2026), <https://blogs.cisco.com/networking/the-less-obvious-headliner-at-bottlerock-2026>.

⁷ Foundry and Cisco, "No Time to Wait: The Accelerating Impact of AI on Campus and Branch Networks" (June 2026), https://www.cisco.com/c/m/en_us/solutions/networking/ai-impact-campus-branch-networks.html ("Foundry AI Impact Report").

Question	Your response
	increase overall traffic on enterprise networks by about <u>900 percent</u> over the next decade.⁸ If these 88 areas are overly restrictive, they will stifle the UK's ability to scale AI, as enterprises will be denied the spectrum necessary to support these high-bandwidth applications. 4. Alignment with Global Ecosystems and Talent Constraints Cisco emphasises that technical conditions within these 88 areas must remain strictly aligned with international standards (such as WINNF-TS-1014). This is particularly critical given the UK's talent landscape: 85% of UK organisations report challenges in hiring, with 50% citing a shortage of candidates with advanced wireless or AI-integrated skills as their primary barrier.⁹ By maintaining global alignment, we ensure that UK IT teams—who are already stretched thin—can utilise the same mature, global Wi-Fi 7 ecosystem and training resources that are available internationally, rather than being forced to master "UK-specific" AFC configurations that would further strain their limited bandwidth. Conclusion Cisco agrees with the proposed framework as a necessary step to provide the investment certainty we previously advocated for. We believe this approach is a balanced compromise, provided that Ofcom remains vigilant against over-inclusion, commits to maintaining stable boundaries, and prioritises the rapid development of enhanced sharing mechanisms to ensure that the UK's spectrum resources are fully utilised to drive the "multiplier effect" of wireless investments for the UK economy.
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	Cisco supports Ofcom's proposal to proactively clear fixed links in and around the 88 designated high-density areas, while maintaining the flexibility to permit new fixed link applications outside of these zones. We believe this approach strikes the necessary balance between enabling high-performance wireless capacity in urban

⁸ Cisco, "AI Impact on Wide Area Networks," <https://www.cisco.com/c/dam/en/us/solutions/collateral/artificial-intelligence/mass-scale-infrastructure/ai-network-traffic-report.pdf>.

⁹ Cisco recently reached a Memorandum of Understanding with the UK Government establishing a strategic partnership to accelerate AI innovation, strengthen digital infrastructure, and expand essential AI skills nationwide. This initiative demonstrates how Cisco is leveraging its expertise in secure networking to support the UK's goal of becoming a global leader in AI-driven growth and digital resilience. See Department of Science, Innovation, & Technology, "Memorandum of Understanding between the UK and Cisco on AI opportunities" (8 June 2026), <https://www.gov.uk/government/publications/memorandum-of-understanding-between-the-uk-and-cisco-on-ai-opportunities/memorandum-of-understanding-between-the-uk-and-cisco-on-ai-opportunities>.

Question	Your response
applications outside of high-density areas, subject to coordination?	centres and preserving efficient spectrum use in more remote areas. 1. Investment Certainty Through Proactive Clearance Cisco has consistently advocated for regulatory frameworks that provide long-term investment predictability. The proactive clearance of fixed links in high-density areas is a critical step in "cleaning" the band, which is essential for the success of future mobile services. By removing incumbents that would otherwise be incompatible with high-density mobile operations, Ofcom is reducing regulatory uncertainty. We support the five-year notice period as a fair and transparent transition mechanism that allows existing licensees sufficient time to plan their migration to alternative bands. 2. Flexibility for Enterprise and Utility Backhaul We also agree with the proposal to leave the band open to new fixed link applications outside of the 88 high-density areas. Many of our enterprise customers—including public utilities, healthcare providers, and manufacturing facilities—rely on fixed links for critical backhaul connectivity in suburban and rural environments where fibre deployment may be economically unfeasible. Maintaining the availability of the 6 GHz band for these use cases ensures that enterprises can continue to support essential operations without unnecessary geographic constraints. 3. The Importance of a Clear Migration Path While we support the clearance of fixed links, we urge Ofcom to ensure that the revocation process is accompanied by clear technical and administrative support for those affected. As noted in our previous filings, many of these fixed links serve as critical backhaul for enterprise and public utility networks. To ensure this transition does not inadvertently disrupt mission-critical infrastructure, Cisco recommends that Ofcom: • Provide Clear Migration Guidance: Offer affected licensees transparent guidance on alternative spectrum bands that are suitable for their specific technical requirements (e.g., latency, throughput, and link distance).

Question	Your response
	• Prioritise Critical Services: As Ofcom has noted, some links in Northern Ireland and other regions serve critical functions. We support the proposal to consider exceptions on a case-by-case basis where alternative means of delivery (such as fibre or alternative bands) are not viable. 4. Efficient Coordination Mechanisms Cisco supports the requirement that new fixed link applications outside of high-density areas remain subject to coordination. To maintain the efficiency of this process, we encourage Ofcom to utilise transparent, database-driven coordination mechanisms—ideally leveraging the same AFC-style logic used for Wi-Fi coexistence. This ensures that the coordination process is predictable, fast, and does not become an administrative bottleneck for enterprises seeking to deploy necessary backhaul solutions. Conclusion Cisco believes that this two-pronged approach—proactive clearance in high-density zones and managed access elsewhere—is the most proportionate way to enable the shared use of the 6 GHz band by Mobile and Wi-Fi networks. We look forward to working with Ofcom to ensure the transition is executed in a manner that protects both the UK’s digital infrastructure and the long-term viability of enterprise wireless deployments.
Question 3: Do you agree with the approach we have set out to identify the links which will be affected by the proposed revocation?	Cisco generally supports the methodology Ofcom has proposed to identify fixed links subject to revocation. We recognise the complexity inherent in balancing the need for clear spectrum for new mobile and Wi-Fi deployments with the requirement to protect incumbent users from harmful interference.
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?	Cisco supports Ofcom’s proposal to remove the 7110–7125 MHz frequencies from the permanent PMSE allocation while maintaining a "borrowing" mechanism for major events. We believe this approach effectively balances the need for long-term, high-capacity spectrum for mobile and Wi-Fi services with the unique, temporary requirements of the PMSE sector. 1. Maximising Spectrum Efficiency The Upper 6 GHz band is a critical resource for the UK’s digital future. By

Question	Your response
	formalising the removal of the 7110–7125 MHz overlap, Ofcom is creating the necessary contiguous blocks of spectrum required for modern, high-bandwidth mobile and Wi-Fi 7 deployments. As we have noted in previous submissions, the proliferation of data-intensive applications—such as cloud-based AI processing and real-time industrial automation—requires large, unencumbered channels. This proposal is a proportionate step toward maximising the economic and social utility of this spectrum. 2. The Viability of the "Borrowing" Mechanism Cisco agrees that the "borrowing" model is an appropriate solution for the PMSE sector's peak demand events. PMSE usage is inherently episodic and geographically localised. It is significantly more spectrum-efficient to allow PMSE to "borrow" spectrum during major events—subject to coordination—than to reserve large swaths of spectrum for permanent, low-duty-cycle use. This model ensures that the UK can continue to host world-class events (such as the Formula 1 British Grand Prix) without permanently reserving spectrum that could otherwise be used to power the UK's enterprise and consumer connectivity. 3. Importance of Coordination Predictability For the borrowing mechanism to be successful, it must be supported by a transparent and predictable coordination framework. Cisco encourages Ofcom to ensure that the rules for "borrowing" are clearly defined and that the coordination process is robust enough to prevent interference with permanent mobile or Wi-Fi deployments. We believe that leveraging database-driven coordination—similar to the AFC systems used for Wi-Fi—could provide the necessary visibility for both PMSE users and permanent licensees to coexist during these major events. 4. Ensuring Long-Term Stability for PMSE While we support this proposal, we also recognise the importance of the PMSE sector to the UK's creative and sporting industries. We encourage Ofcom to continue its holistic review of PMSE spectrum supply (as mentioned in the consultation) to ensure that the creative sector has a long-term, sustainable path for its wireless needs. Cisco remains committed to supporting the development of

Question	Your response
	advanced wireless solutions that can help the PMSE sector transition to more efficient, modern technologies that require less spectrum over time. Conclusion Cisco agrees with the proposal to remove the permanent PMSE allocation in the 7110–7125 MHz range. This is a pragmatic, evidence-based decision that prioritises the long-term capacity needs of the UK’s digital infrastructure while providing a flexible, "borrowing-based" safety net for the country's most significant cultural and sporting events.
Question 5: Do you agree with our proposal to require mobile base stations to protect RAS usage of the band at the levels specified?	Cisco supports Ofcom’s proposal to require mobile base stations to protect the Radio Astronomy Service (RAS) in the 6650–6675.2 MHz band. Protecting the integrity of scientific research is a vital public interest, and we believe that the proposed interference limit of -159 dBm/50kHz is a proportionate and technically sound approach to ensuring coexistence. Our support for this proposal is based on the following considerations: 1. Proportionality and Targeted Protection We agree with Ofcom’s assessment that this protection requirement is both proportionate and justified. The impact on mobile deployment is geographically and technically limited, affecting only a narrow frequency range in the vicinity of the six e-MERLIN radio astronomy sites. By focusing protection requirements on these specific locations, Ofcom avoids the need for broad, inefficient restrictions that would otherwise constrain mobile and Wi-Fi capacity across the wider UK. 2. Technical Feasibility for Mobile Deployments The proposed coordination requirement, while imposing an additional planning step for mobile network operators (MNOs), is manageable within the context of modern network design. MNOs are accustomed to coordinating deployments around sensitive sites, and we believe that the modelling assumptions—including the 14dB reduction factor for antenna gain—provide a realistic basis for coexistence. This ensures that MNOs can continue to deploy high-capacity services in urban centres like Manchester, Liverpool, and Cambridge without compromising the scientific mission of the e-MERLIN array.

Question	Your response
	3. Alignment with Future-Proofing As we noted in our March 2026 filing, Cisco is committed to the development of advanced wireless solutions that can coexist with incumbent services. We believe that the use of database-driven coordination—similar to the AFC framework we support for Wi-Fi—is the most effective way to manage these protection zones. We encourage Ofcom to ensure that the parameters for these RAS protection zones are transparent and integrated into future coordination databases, providing MNOs with the clarity they need for long-term network planning. 4. Avoiding "Over-Protection" While we support the protection of RAS, we also encourage Ofcom to remain vigilant against "over-protection." As the technical conditions for mobile deployment evolve, we suggest that Ofcom periodically review these protection requirements to ensure they remain based on the most current and accurate data. This will ensure that as technology improves, we continue to maximise the economic and social utility of the 6 GHz band without imposing unnecessary limitations on mobile or Wi-Fi connectivity. Conclusion Cisco agrees with the proposal to protect RAS usage at the specified levels. This approach demonstrates a balanced regulatory framework that successfully safeguards essential scientific research while maintaining the flexibility required to deploy high-performance wireless infrastructure across the UK.
Question 6: Do you have any comments on how we should manage coexistence between mobile and any other users in the Upper 6 GHz band (i.e., RAS, EESS, SRDs, FSS and MOD use)?	Cisco appreciates Ofcom’s thorough assessment of the coexistence challenges in the Upper 6 GHz band. We generally agree with the proposed management strategies, as they prioritise evidence-based coexistence over blanket restrictions. Our comments on specific incumbent services are as follows: 1. Fixed Satellite Service (FSS) Cisco supports Ofcom’s intention to adopt the vertical elevation EIRP mask agreed upon at WRC-23. As we have consistently argued, global alignment on technical conditions is essential to minimise manufacturing complexity and ensure a seamless ecosystem for both mobile and Wi-Fi equipment. Adopting this internationally harmonised mask provides the necessary protection for satellite

Question	Your response
	receivers while offering clear, predictable design parameters for mobile base station manufacturers. 2. Earth Exploration Satellite Service (EESS) We agree with Ofcom's assessment that interference management for EESS is best addressed at the international level. Given the wide-area nature of potential impact zones, unilateral national restrictions would be ineffective and could impose severe, unnecessary constraints on mobile and Wi-Fi deployment. Cisco continues to support Ofcom's efforts to work through the ITU and CEPT to find a long-term, internationally harmonised allocation for EESS in a new band, which remains the most effective way to safeguard these vital climate-monitoring services. 3. Short-Range Devices (SRDs) and Ultra-Wideband (UWB) Cisco concurs with Ofcom's view that the technical characteristics of Tank Level Probing Radar (TLPR) and UWB devices inherently limit the risk of interference. The enclosed nature of industrial tanks, downward-facing antennas, and the low-power, non-protection basis of UWB operations provide a robust foundation for coexistence. We see no need for additional regulatory intervention in this area, as the current environment has proven sufficient for these technologies to operate alongside existing wireless services. 4. Ministry of Defence (MOD) Use We support the proposal to maintain the status quo regarding MOD usage. Because MOD operations are generally limited to select, remote locations, they do not present a material barrier to the widespread deployment of mobile or Wi-Fi services in the high-density urban areas where demand is concentrated. Maintaining this flexibility allows the MOD to continue its essential functions without imposing broad, inefficient restrictions on the commercial wireless ecosystem. 5. General Principles for Coexistence As a broader principle, Cisco encourages Ofcom to favour database-driven coordination and technical performance masks over static, geographic exclusion zones wherever possible. • Dynamic Coordination: As demonstrated by the success of AFC systems, database-driven models

Question	Your response
	allow for real-time, precise coexistence that maximises spectrum utility. • Transparency: For all incumbent services, we urge Ofcom to maintain transparency regarding the protection criteria used. Providing stakeholders with clear, accessible information on these criteria allows for better network planning and reduces the risk of unintended interference. Conclusion Cisco believes that Ofcom’s current coexistence strategy is sound and proportionate. By focusing on international harmonisation for satellite services, recognizing the inherent technical safeguards for SRDs/UWB, and maintaining a localised approach for MOD and RAS, Ofcom is successfully navigating the complexities of the Upper 6 GHz band. We remain committed to working with Ofcom to ensure that these coexistence frameworks continue to evolve in line with the latest technical data and international standards.
Question 7: Do you have any comments on our assessment of the impacts of our proposals (to the extent not covered by previous questions)?	Cisco commends Ofcom for the comprehensive nature of its impact assessment, which reflects a balanced approach to the complex task of spectrum management in the Upper 6 GHz band. Our comments on the assessment focus on the need to ensure that the long-term economic and social benefits of this spectrum are fully realised. 1. Recognition of the "Investment Certainty" Premium We agree with Ofcom’s assessment that the economic benefits of mobile and Wi-Fi deployment in high-density areas are significant. However, we would encourage Ofcom to place even greater emphasis on the role of investment certainty as a driver of economic growth. As we have noted in our previous filings, enterprise customers—such as those in manufacturing, healthcare, and logistics—require long-term operational predictability to justify the significant capital investments necessary for Wi-Fi 7 and beyond. The impact assessment should explicitly recognise that regulatory clarity (e.g., the stability of the 88 high-density area boundaries) is a primary enabler of the productivity gains Ofcom anticipates.

Question	Your response
	2. Proportionality of the Clearance Costs Cisco supports the assessment that the costs of clearing fixed links (estimated at £17.5m in the baseline scenario) are proportionate when weighed against the transformative potential of high-capacity mobile and Wi-Fi services. We agree that the "targeted clearance" approach is the most efficient path forward to enable mobile network deployment. By focusing on high-density areas where the demand for capacity is highest, Ofcom will maximise the impact of this spectrum. We encourage Ofcom to continue monitoring these costs and to ensure that the transition support provided to affected licensees is sufficient to prevent any unintended disruption to critical enterprise backhaul services. 3. The "Opportunity Cost" of Delay In assessing the impacts, we urge Ofcom to consider the profound opportunity cost of delaying licence-exempt access to the full Upper 6 GHz band. One recent academic study quantifies the economic penalty of restricting Wi-Fi access to only the lower portion of the 6 GHz band. The study estimates that the EU-27 may have forgone €8,125 million in GDP in 2025, rising to €11,275 million in 2030, due to constrained growth in network quality resulting from not opening the Upper 6 GHz band to licence-exempt operations.¹⁰ Over a six-year period, this represents a total potential GDP loss of €58,366 million across the EU member states if the full band is not made available for licence-exempt use. Even if Ofcom's planned five-year notice period for incumbents starts this year, mobile deployments in the Upper 6 GHz band will not begin until 2031. Every month that this spectrum remains underutilised is a month where UK enterprises are constrained by legacy wireless bottlenecks, hindering the adoption of AI-driven applications and real-time industrial automation. Those needs are clear, as reflected in Cisco's <i>State of Wireless Report</i> and the <i>Foundry AI Impact Report</i> discussed above. Ofcom's impact assessment should reflect that the opportunity cost of a conservative spectrum policy is

¹⁰ Roger Sanchez-Vital, Elena Lopez-Aguilera, and Eduard Garcia Villegas, "The 6 GHz Policy Trade-off: Wi-Fi Access, Economic Value, and Europe's Digital Future," (11 May 2026), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=6809503 (paper currently under review).

Question	Your response
	not merely theoretical, but a measurable drag on national GDP. By proactively opening the full band, Ofcom has a unique opportunity to demonstrate to other European governments that it is not ignoring the immense opportunity cost of allowing this critical spectrum to lay fallow. Many European regulators continue to wait for harmonised consensus while their domestic digital economies suffer the consequences of constrained capacity. The UK's decisive approach serves as a vital signal to the region, proving that spectrum policy must be driven by macroeconomic data rather than regulatory delay. By setting this standard, the UK not only secures its own digital future but demonstrates the strong leadership needed for other European administrations to move beyond the status quo. 4. Holistic View of Digital Infrastructure Cisco appreciates that Ofcom has considered the impacts on various sectors, including utilities and public services. We agree that the "case-by-case" exception process for critical services is a necessary safety valve. We would further suggest that the impact assessment acknowledge the interdependency of these technologies; for example, how high-performance Wi-Fi in a hospital or university can offload mobile traffic, thereby improving the overall performance of the mobile network. A holistic view of the digital ecosystem—where mobile and Wi-Fi are viewed as complementary rather than competing—is essential for a truly accurate assessment of the UK's spectrum needs. We also applaud Ofcom's consideration of possible future spectrum sharing technologies that would allow even more efficient spectrum usage amongst Wi-Fi, mobile, and other wireless operations. As spectrum needs grow and the number of readily available bands shrinks, regulators, end users, and the private sector must develop and embrace sharing technologies that maximize the efficient use of spectrum through cooperative and ideally complementary operations wherever possible. Conclusion Cisco believes the impact assessment is robust and provides a sound foundation for the

Question	Your response
	proposed policy. We support the move toward a more dynamic, high-capacity spectrum environment and are confident that the proposed framework will foster a world-class digital infrastructure for the UK. We look forward to continuing our collaboration with Ofcom as these proposals move toward final implementation, ensuring that the UK remains at the forefront of global wireless innovation.
Question 8: Do you have any comments on our Equality impact assessment?	Cisco appreciates Ofcom's commitment to ensuring that its spectrum management policies are inclusive and do not create adverse impacts for specific groups. We have reviewed the Equality Impact Assessment (EIA) and offer the following observations to further support Ofcom's objectives. 1. Digital Inclusion and the "Digital Divide" Cisco strongly supports Ofcom's focus on the needs of persons in different parts of the UK and those in both urban and rural areas. We believe that the proposed framework for the Upper 6 GHz band—particularly the ability for Wi-Fi to provide high-capacity backhaul—has significant potential to bridge the "digital divide." As noted in our previous filings, outdoor standard-power Wi-Fi can be a transformative tool for extending high-speed broadband to underserved communities where traditional fibre or mobile macro-cell deployment may be economically unfeasible. We encourage Ofcom to ensure that the final policy remains flexible enough to allow for these "community-first" deployments, which directly support the goal of social and economic equality. 2. Equitable Access to High-Performance Connectivity The EIA correctly identifies that access to high-capacity networks is a key driver of equality of opportunity. In modern society, high-speed, reliable connectivity is a prerequisite for access to education, healthcare, and employment. By facilitating the rapid deployment of Wi-Fi 7 and advanced mobile services, Ofcom is directly contributing to a more equitable digital landscape. We suggest that the impact assessment continue to monitor whether the "high-density" designation of the 88 areas creates any unintended "digital deserts" in neighbouring regions. While we support the current 88-area framework, we urge Ofcom to maintain a long-term view

Question	Your response
	on how to ensure that citizens outside these zones are not left behind as the UK's digital infrastructure evolves. 3. Support for Critical Public Services Cisco agrees with Ofcom's assessment regarding the protection of public services, particularly in Northern Ireland. We support the proposal to consider exceptions on a case-by-case basis for fixed links that serve critical functions. Ensuring that public services—which are often the lifeline for the most vulnerable members of society—remain uninterrupted is a fundamental aspect of an equitable spectrum policy. We are confident that the proposed statutory revocation process will strike the right balance between modernising the band and protecting these essential services. Conclusion Cisco finds Ofcom's Equality Impact Assessment to be thorough and well-aligned with the goal of fostering an inclusive digital economy. We believe the proposed policies will, on balance, significantly improve the quality and availability of wireless connectivity for all UK citizens. We remain committed to working with Ofcom to ensure that the implementation of these proposals continues to prioritise accessibility, social inclusion, and equitable access to the benefits of the 6 GHz band.
Question 9: Do you have any comments on our Welsh Language impact assessment?	No comments