

Your response

Please provide evidence in support of your views.

Question	Your response
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.	The GSMA welcomes Ofcom's recognition of the upper 6 GHz band for future mobile and appreciates the complexity of balancing competing demands. However, the GSMA does not agree with the proposal to licence the band on a sub-national basis across 88 defined high-density areas. We believe the proposal as drafted is misaligned with the technical characteristics of the 6 GHz band, the emerging global ecosystem and the long-term interests of UK consumers and businesses. We have outlined our reasoning below. We recommend the assignment of national licences to better reflect current and future mobile deployments. A longer-term approach is needed to ensure the framework remains fit for purpose, including to support 6G development over the next decade. 6 GHz as the 6G pioneer band The upper 6 GHz represents the most important mid-band spectrum available for the next generation of mobile services. GSMA's Vision 2040: Spectrum for the Future of Mobile Connectivity¹ study shows that cities with over 50% of the world's urban population will be capacity-constrained by 2030 (just as 6G rollouts may begin) if without additional mid-bands.

¹For further details: <https://www.gsma.com/newsroom/press-release/6g-mobile-networks-will-need-up-to-three-times-todays-spectrum-to-meet-surging-data-demands-new-gsma-report-shows/>

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	In Europe, upper 6 GHz remains the only feasible mid-band spectrum capable of addressing these near-term urban capacity requirements while enabling initial 6G deployments around the end of this decade. This capability is important to meet the challenge of increasing data demand as existing applications develop and new use cases and applications are deployed at scale. 6 GHz can also provide wide contiguous channels of over 200 MHz that will be required to power 6G networks. Trials of equipment have been carried out since 2022, reaching peak data speeds of 12 Gbps. As a result, the Radio Spectrum Policy Group (RSPG) identified upper 6 GHz in its recent Draft Opinion on a 6G Roadmap² as the “primary band suitable for the introduction of 6G”, and countries representing more than 80% of the global population have now signalled support for mobile use in this band. The device and infrastructure ecosystem is developing fast, and it is sufficiently ready to support commercial deployment. The first upper 6 GHz assignment processes have been finalised, and more awards are expected in the coming years in EMEA, APAC and the Americas. In April 2026, the UAE³, announced the world’s first commercial upper 6GHz network and ecosystem. To this end, it is vital that the UK’s licensing framework does not jeopardise UK operators’ ability to benefit from the emerging ecosystem and economies of scale. Mid-band characteristics make localised licensing unsuitable Ofcom’s proposed 88 high-density area approach is suited for licensing high bands, such as mmWave frequencies above 24 GHz – where very limited propagation range and building penetration make localised licensing a better

² For further details <https://www.gsma.com/newsroom/press-release/6g-mobile-networks-will-need-up-to-three-times-todays-spectrum-to-meet-surging-data-demands-new-gsma-report-shows/>

³ For further details : https://radio-spectrum-policy-group.ec.europa.eu/document/download/75f0d0e2-9c82-469c-859d-0f48eedf082c_en?filename=RSPG26-004final-DRAFT-RSPG_Opinion_6G_Spectrum_Roadmap_PC.pdf

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	fit. mmWave is well-placed for targeted hotspot environments, such as major indoor venues, arenas, or transport hubs, but its technical characteristics mean it cannot support wide-area coverage. On the other hand, the 6 GHz band sits in a fundamentally different category. As mid-band spectrum, it behaves similarly to 3.5 GHz (the global core 5G band), and national licensing is therefore better suited to strengthening the UK's mobile connectivity infrastructure in the long-term. Mid-band spectrum delivers wide-area capacity and accounts for a significant proportion of indoor mobile usage in urban areas. Data⁴ from a sample of global cities from SpeedTest Intelligence (provided by Ookla), shows that most mobile use is indoors and largely delivered over mid-band spectrum. In the case of indoor 5G, most traffic is delivered using the 3.5 GHz frequency range. Mid-band frequencies in some cities account for almost 90 % of indoor mobile data delivery, and the expected deployment model for 6 GHz is as an overlay on existing 3.5 GHz macro network grids, covering urban and suburban areas rather than discrete hotspot locations. The upper 6GHz band can therefore effectively provide an additional capacity layer in urban and suburban environments and meet the majority of indoor and outdoor requirements. National licensing serves the public interest As presented above, upper 6 GHz is the only option for the introduction of 6G in Europe. If the band is only licensed in a certain number of high-density areas, there is a risk of limiting the expansion of 6G and the capabilities and uses cases it enables. Residential areas outside major urban centres, suburban communities, smaller cities, rural towns, and

⁴ For further details: https://www.gsma.com/connectivity-for-good/spectrum/wp-content/uploads/2024/09/GSMA_Mobile-Evolution-in-6-GHz.pdf

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	the businesses and public services that rely on mobile connectivity would be left without access to the principal band on which next-generation mobile services will be built. This approach risks creating two classes of connectivity, where some consumers and businesses benefit from next-generation mobile while others are left behind. The average economic benefit of full-power licensed mobile in the upper 6 GHz band has been assessed at seven times greater than unlicensed alternatives⁵ and restricting national coverage through localised licensing would sacrifice much of this value. National licensing enables operators to plan, invest in, and deploy 6 GHz spectrum as a capacity layer, delivering consistent service quality across the coverage footprint and providing the regulatory certainty needed for the long-term infrastructure investment that 6G requires. At a minimum, those 88 proposed areas should be expanded as the target areas for mobile deployments at 3.5 GHz and therefore 6 GHz have now increased beyond what was envisaged a few years ago. Additionally, there are concerns about the lack of clarity on how mobile spectrum will be assigned and prioritized for mobile outside the 88 priority areas. Furthermore, the consultation does not indicate whether, or when, these areas will be revisited in the future, leaving operators without the certainty they need to plan investment and network deployment. Building on Ofcom’s existing Local Access Licence (LAL) framework We recognise Ofcom’s duty to enhance the efficient use of spectrum and foster innovation. However, Ofcom already has a well-tested framework

⁵ [6 GHz in Europe](#), GSMA, 2025

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	that could address many of these use cases without the need for a separate area-based regime. A more effective approach to enabling localised access to the upper 6 GHz band would be to build on the existing LAL framework, rather than introducing a new regime limited to high-density areas. Importantly, AFC would remain implemented under this approach, with WiFi access continuing to be controlled through it. The LAL model is specifically designed to support shared, location-specific use alongside national licensing, allowing users to access unused spectrum on a case-by-case basis while fully preserving mobile network operator rights and ensuring coordination on technical conditions such as power levels and synchronisation. This enables flexible, demand-led access wherever and whenever it is needed, rather than restricting availability to a pre-defined set of locations. Therefore, we would encourage Ofcom to consider extending LAL to cover the 540 MHz mobile priority portion of the upper 6 GHz band. Once the band is assigned nationally, LALs can deliver the same local access outcomes Ofcom is seeking to support private networks and innovation, without fragmenting spectrum or constraining wide-area mobile deployment.
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?	As highlighted in our submission to Ofcom’s January 2026 Statement and further consultation: <i>‘Expanding access to the 6 GHz band for commercial mobile and Wi-Fi services’</i>, the mobile industry has extensive experience in managing coexistence between services across a range of frequency bands. Importantly, many of the fixed links in the upper 6 GHz band are operated and managed by mobile network operators, meaning that operators are best placed to manage the transition and coordinate coexistence effectively, minimising disruption while enabling timely clearance.

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	We recognise that fixed links continue to play an important role in connecting sparsely populated and rural areas, and we support retaining access to the band for new fixed link applications outside high-density areas, subject to coordination.
Question 3: Do you agree with the approach we have set out to identify the links which will be affected by the proposed revocation?	n/a
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?	n/a
Question 5: Do you agree with our proposal to require mobile base stations to protect RAS usage of the band at the levels specified?	n/a
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)?	n/a
Question 7: Do you have any comments on our assessment of the impacts of our proposals (to the extent not covered by previous questions)?	n/a
Question 8: Do you have any comments on our Equality impact assessment?	n/a
Question 9: Do you have any comments on our Welsh Language impact assessment?	n/a

Please tell us how you came across this consultation.

- ☐ Email from Ofcom
- ☐ Saw it on social media
- X Found it on Ofcom's website
- ☐ Found it on another website
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