

## Your response

Please provide evidence in support of your views.

| Question                                                                                                                                                             | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <b>Question 1:</b> 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. | <p>Confidential? – N</p> <p>We support the subnational geographic layout proposed for high-power mobile licensing as a practical, localized solution to address urban congestion. However, the framework must account for the distinct spatial and temporal dynamics of modern wireless demand:</p> <ul style="list-style-type: none"><li>• <b>The Population-Enterprise Correlation:</b> Business and institutional infrastructure is naturally concentrated where population density is highest. Consequently, the urgent demand for expanded Wi-Fi airwaves peaks within these exact 88 high-density footprints.</li><li>• <b>Immediate Enterprise Connectivity Needs:</b> Higher-education campuses, medical centers, modern logistics hubs, retail malls, and massive sports venues have an immediate, critical requirement for reliable, wide-channel wireless access to deploy enterprise-grade private networks.</li><li>• <b>Temporal versus Constant Demand:</b> Several locations within the 88 designated areas (as mapped out in 6ghz_hd_areas_v1.zip) only witness severe mobile capacity constraints during brief, seasonal windows—such as coastal resorts experiencing spikes solely during summer festivals.</li></ul> <p><b>Eliminating the Pre-2030 Spectrum Void:</b> Because widespread cellular macro-station rollouts in this band are not expected until approximately 2030, leaving these airwaves empty would block massive commercial utility. We strongly welcome the parallel regulatory track to authorize opportunistic Wi-Fi access via Automated Frequency Coordination (AFC) systems by the end of 2026, creating an immediate operational path for local business networks.</p> |

| Question                                                                                                                                                                                                                                                            | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <p><b>Question 2:</b> 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?</p> | <p>Confidential? – N</p> <p>Yes. Initiating a targeted clearance of legacy point-to-point links within the 88 high-density clusters represents a necessary step to pave the way for high-capacity services. Leaving the remainder of the country open to new coordinated fixed link applications preserves backhaul agility for rural utility and corporate operations where spectrum real estate is less contested. Crucially, clearing these urban links avoids technical obstacles for the opportunistic Wi-Fi networks scheduled to go live under AFC control in late 2026.</p> |
| <p><b>Question 3:</b> Do you agree with the approach we have set out to identify the links which will be affected by the proposed revocation?</p>                                                                                                                   | <p>Confidential? – N</p> <p>Yes. The propagation criteria and technical adjustment allowances outlined in the consultation document represent a sound and realistic methodology to identify problematic links without causing over-clearance. It is vital that these technical separation metrics are integrated directly into the centralized databases supporting the 2026 opportunistic Wi-Fi launch, ensuring absolute protection for surviving links while maximizing the operational window for indoor devices.</p>                                                           |
| <p><b>Question 4:</b> 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?</p>                     | <p>Confidential? – N</p> <p>Yes. Phasing out routine wireless camera access across the 7110–7125 MHz segment is a reasonable modification, given that the surviving 7 GHz allocation offers more than enough headroom to accommodate normal PMSE operations. Maintaining a flexible, event-based "borrowing" mechanism for tier-one broadcasts provides an excellent safety valve, ensuring exceptional localized demand can be met via precise, real-time spatial planning.</p>                                                                                                    |
| <p><b>Question 5:</b> Do you agree with our proposal to require mobile base stations to protect RAS usage of the band at the levels specified?</p>                                                                                                                  | <p>Confidential? – N</p> <p>Yes. We endorse the mandatory protection threshold of -159 dBm/50kHz to insulate the six e-MERLIN radio astronomy installations from severe out-of-band degradation. However, we urge Ofcom to calculate these isolation boundaries using site-specific clutter data to ensure that telescope protection does not create unnecessarily</p>                                                                                                                                                                                                              |

| Question                                                                                                                                                                                     | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|                                                                                                                                                                                              | <p>large exclusion zones that penalize local enterprise Wi-Fi setups or near-term 2026 AFC operations.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><b>Question 6:</b> 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)?</p> | <p>Confidential? – N</p> <p>We strongly support Ofcom’s pivot toward empirical, evidence-driven sharing over archaic, static exclusions.</p> <p><b>Dynamic Database Coordination:</b> Dynamic database lookups are the optimal method for modern spectrum management. In zones where mobile networks are un-built or silent, licence-exempt systems should be permitted to use the airwaves opportunistically.</p> <p><b>Low Power Indoor (LPI) Wi-Fi coexistence:</b> A vast body of international research (including extensive testing by CEPT and the FCC) proves that low-power indoor wireless devices present a negligible risk of causing harmful interference to primary services. Activating the AFC architecture by late 2026 will provide a practical, real-world blueprint for how database-led coordination can safely expand indoor corporate connectivity without eroding primary protections.</p> |
| <p><b>Question 7:</b> Do you have any comments on our assessment of the impacts of our proposals (to the extent not covered by previous questions)?</p>                                      | <p>Confidential? – N</p> <p>While the impact assessment effectively balances the future needs of both ecosystems, Ofcom should place far greater structural emphasis on the near-term economic dividend generated by licence-exempt infrastructure. Wi-Fi acts as the workhorse for gigabit enterprise networking, industrial warehouse automation, healthcare data delivery, and modern learning environments. Activating opportunistic Wi-Fi by the end of 2026 resolves the risk of spectral underutilization during the multi-year transition to mobile. This policy will catalyse a powerful "multiplier effect," stimulating immediate private wireless investment years before widespread 2030 macro-cellular mobile rollouts materialize.</p>                                                                                                                                                              |
| <p><b>Question 8:</b> Do you have any comments on our Equality impact assessment?</p>                                                                                                        | <p>Confidential? – N</p> <p>We agree with the conclusions of the assessment. Furthermore, accelerating high-capacity indoor network capabilities within public facilities—such as hospitals and university libraries—will play a vital role in expanding</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

| Question                                                                             | Your response                                                                       |
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|                                                                                      | digital equity and supporting vulnerable user groups, students, and remote workers. |
| <b>Question 9:</b> Do you have any comments on our Welsh Language impact assessment? | Confidential? – N<br><br>We have no further comments on this section.               |

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