

## Your response

| Question                                                                                                                                                                                                                                                            | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| <p><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>                                                                                         | <p>Confidential? – N</p> <p>No response given.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <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>The Port of London Authority (PLA) does not express a view either in agreement or disagreement with Ofcom’s 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 those areas, subject to coordination.</p> <p>While we recognise the rationale presented by Ofcom for its preferred option, we are naturally disappointed that the current proposals would result in the revocation of <i>all</i> Upper 6 GHz fixed links operated by the PLA. The PLA does not operate any Upper 6 GHz fixed links outside the scope of the proposed clearance, and the impact of the proposals on the organisation is substantial. These links support operationally critical maritime functions, and their displacement presents disproportionate technical and financial challenges when compared with more typical fixed-link deployments.</p> <p>We note that Ofcom’s analysis is based on assumptions intended to represent an “average” fixed link. Given the relatively low number of Upper 6 GHz licences in operation overall, yet the potentially very significant costs and operational consequences for affected licensees, it does not seem unreasonable to expect that more detailed, case-by-case analysis could have been undertaken where atypical or specialist use-cases are known to exist.</p> <p>This concern is compounded by Ofcom’s acknowledgment that certain mitigation options will not be available to all users, for example where the introduction of additional hops is impractical over long maritime paths. In the PLA’s case, existing links deliberately exploit large Fresnel zones to minimise line-of-sight interruptions caused by vessel movements and tidal effects. The use of</p> |

| Question                                                                                                                                          | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|                                                                                                                                                   | <p>intermediate hops over water is unfeasible, and the provision of additional land-based sites can introduce costs that can extend into the millions of pounds, alongside planning, legal, and long-term resilience risks.</p> <p>In this context, the PLA reiterates its position from earlier responses that Ofcom is uniquely placed to take a more proactive role in assisting incumbent users to identify alternative spectrum and migration solutions that are genuinely suited to their specific operational requirements. Where the impact of revocation is total rather than incremental, reliance on generic assumptions risks leaving specialist operators without viable replacement solutions that deliver equivalent performance, availability, and safety outcomes.</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>It is noted that the consultation describes harmful interference as arising “particularly when the mobile base station is in the main beam of the fixed link antenna”, whilst the proposed clearance approach within high-density areas appears largely wholesale in nature. By contrast, links outside of high-density areas appear to have been assessed using a more detailed coexistence methodology.</p> <p>The PLA notes Ofcom’s acknowledgement in paragraph 4.13 that “the scale of any such over-clearance would be limited”. However, whilst a broader clearance approach may represent the simplest regulatory solution, the consultation does not appear to fully justify why the potential administrative burden associated with more granular coexistence assessment would be disproportionate when weighed against the potentially substantial financial and operational burden placed upon incumbent users whose links may in practice be capable of coexistence.</p> <p>Whilst it is appreciated that mobile deployment within high-density areas should not be materially constrained, it would clearly be more efficient and cost-effective for incumbent users if technically tolerable links could remain in operation where coexistence is achievable.</p> |

| Question                                                                                                                                                                                                                                        | Your response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|                                                                                                                                                                                                                                                 | <p>Furthermore, whilst the consultation discusses several factors intended to add realism to the coexistence modelling, it does not appear to consider whether targeted technical or licensing mitigations could reduce the need for revocation in marginal cases. Examples could include narrower beamwidth antennas, improved antenna discrimination, revised licensing parameters, enhanced receiver resilience, adjusted fade margin assumptions, or limited site-specific coordination measures where these would materially reduce interference susceptibility without imposing significant constraints on mobile users.</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>No response given.</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>No response given.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p><b>Question 6:</b> 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)?</p>                                                     | <p>Confidential? – N</p> <p>No response given.</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>No response given.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p><b>Question 8:</b> Do you have any comments on our Equality impact assessment?</p>                                                                                                                                                           | <p>Confidential? – N</p> <p>No response given.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| Question                                                                             | Your response                           |
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| <b>Question 9:</b> Do you have any comments on our Welsh Language impact assessment? | Confidential? – N<br>No response given. |