

Introduction

Wireless Broadband Alliance (WBA) is the global organization that connects people with the latest Wi-Fi initiatives. Founded in 2003, the vision of the WBA is to drive seamless, interoperable Wi-Fi services experiences within the global wireless ecosystem. The WBA's mission is to bring together global industry leaders, collaborating to accelerate the development, integration and adoption of next-generation Wi-Fi and wireless technologies to deliver business growth, through innovation, technical and standards development, and real-world deployment programs. Its key programs include NextGen Wi-Fi, OpenRoaming, 5G, 6G, IoT, Smart Cities, Testing & Interoperability and Policy & Regulatory Affairs.

[Membership](#) in the WBA includes major operators, service providers, enterprises, hardware and software vendors, and other prominent companies that support the ecosystems from around the world. The [WBA Board](#) comprises influential organizations such as Airties, AT&T, Boingo Wireless, Boldyn Networks, BT, Charter Communications, Cisco Systems, Comcast, HFCL, HPE, Intel, Reliance Jio, RUCKUS Networks, Telecom Deutschland and Turk Telekom.

WBA welcomes the opportunity to provide comments in response to Ofcom's consultation, *"Expanding access to the 6 GHz band for mobile and Wi-Fi services."*

As you can see by our vision, mission and key goals <https://wballiance.com/who-are-wba/>. WBA and its members are uniquely placed to drive a future connectivity model that encompasses convergence and seamless handover between different types of networks (e.g. satellite and terrestrial, public and private, indoor and outdoor, fixed and mobile).

WBA have also set out our 6G vision (see <https://wballiance.com/6g-vision-statement/>) where we make the case why advanced licence-exempt RLAN technologies (e.g. Wi-Fi 7) are essential for 6G success. 6G will face significant indoor propagation challenges depending on the frequency bands used; high-performance Wi-Fi is the necessary mechanism to offload traffic and ensure the commercial viability of 6G architectures.

So as can be seen from above, our members have interests in promoting both Wi-Fi and mobile/IMT technologies and their use, in addition we have agreed the following general position statement on the 6 GHz band.

"WBA considers there is distinct value in both unlicensed and shared use of the 6 GHz band:

For the lower 6 GHz band, WBA recommends maintaining the global harmonization path, keeping it open for unlicensed use, following the example of 100+ countries.

For the upper 6 GHz band:

- In countries that **have already** opened the full band to unlicensed use and where a product ecosystem is established, WBA does not recommend altering the current unlicensed status.
- In countries that **have not yet** opened the full band to unlicensed use, WBA seeks to align membership perspectives on a common framework, which could include:
 - Full allocation to unlicensed use, particularly to support indoor and high-density environments.
 - Initial allocation of the full band to unlicensed use, with a defined assessment period, after which potential sharing options may be considered including hybrid approaches that meet users' requirements the best.
 - Where a band split is being pursued by regulators, and there is prioritization for the different uses, WBA would support shared access, with appropriate mechanism to

coordinate between the different uses (e.g. AFC), being pursued in the parts of the upper 6 GHz band which has been prioritized for public mobile networks.

WBA will continue working with its global membership on the above-mentioned framework and welcomes the opportunity to collaborate with regulators on models that maximize industry benefits from the 6 GHz band. “

WBA as an organisation is very supportive of the overall framework that Ofcom have set out for the future use of both the upper and lower 6 GHz bands. Ofcom’s latest proposals could represent a pivotal moment for the future use of the upper 6 GHz band in the UK. We are also cognisant that Ofcom policy on this topic will also be influential on the world stage and may influence other countries that are still to decide on the best way forward for the use of this spectrum. Those countries will be looking to see if the framework proposed will be able to meet the near-term needs of licence-exempt Wi-Fi with the possible future introduction of high-performance mobile services and licence-exempt Wi-Fi in the UK.

We are supportive of this leadership being provided by Ofcom, and as a high-profile proponent of the advantages that AFC databases can bring, we would like to help contribute to the success of the policies outlined to enable future sharing and co-existence in the band. We believe by implementing a clear way forward to enable a priority-based band split establishing stable high-density areas for any potential mobile use, the UK consumers and industry should be able to benefit from any possible "multiplier effect" in wireless investment this approach may bring.

WBA look forward to working with Ofcom as it refines these proposals. WBA also supports the evidence-based model that Ofcom remains dedicated to using in its approach to its general spectrum management responsibilities for the UK.

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.	There are differing views between our members on the balance between the future mobile and Wi-Fi data usage forecasts used to derive these high-density areas, but WBA can in a general way support the process used to derive the proposed set of 88 high-density areas. The millimetre wave auction process has shown that for these additional mobile capacity bands this approach represents an appropriate way to look at providing for investment certainty and potential future mobile demand. WBA also supports allowing Wi-Fi devices early access if operating under AFC control in these 88 areas before mobile networks are deployed. WBA agree that the approach provides an evidence-based methodology to ensure an appropriate balance to allocate spectrum for potential 6 GHz mobile deployments and avoids policies that could underutilise spectrum. By setting out a defined process to allow AFC controlled Wi-Fi early access to the band it has allowed network operators to plan for any future risk associated with

Question	Your response
	operating either Wi-Fi or Mobile deployments in this band. As future mobile rollout will be post 2030, at least in some areas, based on the 5 year notice period to incumbent users, WBA believe it is essential for Ofcom to use this time to investigate additional co-existence methodologies needed for future sharing between indoor Wi-Fi and macro cellular mobile use in the 88 defined areas where mobile use is to be prioritized. If additional sharing methodologies and technologies can be deployed, they could also allow Wi-Fi to operate in the 88 mobile-priority zones where mobile signals in 6 GHz from outdoor base stations are sparse or do not penetrate indoor areas. WBA believe it is important that technical conditions for Wi-Fi AFC use must remain strictly aligned with international standards (such as WINNF-TS-1014). By maintaining alignment with currently used standards, the UK can utilize the same mature, global Wi-Fi 7 equipment and database ecosystem rather than a "UK-specific" AFC configuration.
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?	WBA supports Ofcom's proposal to proactively clear fixed links in and around the 88 designated high-density areas, we also support flexibility to permit new fixed link applications outside of these zones.
Question 3: Do you agree with the approach we have set out to identify the links which will be affected by the proposed revocation?	WBA generally supports the methodology Ofcom has proposed to identify fixed links subject to revocation. We recognize the need for clear spectrum for new mobile deployments and the requirement to protect incumbent users from harmful interference and to have a path, where necessary, for future fixed link deployment outside these areas.
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?	WBA supports the proposal to remove access to the frequencies 7110–7125 MHz for PMSE use but allow them access to upper 6 GHz spectrum in future for major events where radio planning is normally co-ordinated.

Question	Your response
Question 5: Do you agree with our proposal to require mobile base stations to protect RAS usage of the band at the levels specified?	WBA supports Ofcom's proposal to require mobile base stations to protect the Radio Astronomy Service (RAS) in the 6650–6675.2 MHz band. WBA also agrees with the proposal to protect RAS usage at the specified levels.
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)?	WBA supports Ofcom's thorough assessment of the coexistence challenges in the Upper 6 GHz band. We generally agree with the proposed management strategies, as they prioritize evidence-based coexistence over blanket restrictions. WBA believes that Ofcom's current coexistence strategy is proportionate for introducing a prioritised band split.
Question 7: Do you have any comments on our assessment of the impacts of our proposals (to the extent not covered by previous questions)?	WBA can see that Ofcom have performed a comprehensive impact assessment on the future proposals for the management in the Upper 6 GHz band for a prioritised band split. WBA believes it represents a balanced approach to the issues studied and going forward that Ofcom need to continue to focus on using sharing to maximise where possible the economic and social benefits of this spectrum. WBA 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. WBA believes as spectrum needs grow, regulators, end users, and the private sector must develop and embrace sharing and handover technologies that maximize the efficient use of spectrum through cooperative and ideally complementary operations wherever possible.
Question 8: Do you have any comments on our Equality impact assessment?	WBA can agree that Ofcom's Equality Impact Assessment is thorough and well-aligned with the goal of fostering an inclusive digital economy.
Question 9: Do you have any comments on our Welsh Language impact assessment?	Not confidential No comments

Please tell us how you came across this consultation.

- ☐ Email from Ofcom
- ☐ Saw it on social media
- ☒ Found it on Ofcom's website
- ☐ Found it on another website
- ☐ Heard about it on TV or radio
- ☐ Read about it in a newspaper or magazine
- ☐ Heard about it at an event
- ☐ Somebody told me or shared it with me
- ☐ Other (please specify)