Consultation title	Fixed wireless spectrum strategy: Consultation on proposed next steps to enable future uses of fixed wireless links
Organisation name	SAF Tehnika JSC

Response

Question 1: Do you agree that we have identified the key drivers likely to have a significant impact on the spectrum demand for fixed wireless links? If not, please provide further detail and evidence to support your answer. **Do you have other comments to make/points to raise with us on these issues?**	N/A
Question 2: Do you agree with our conclusions on spectrum implications and our proposed strategy/next steps for each band? **Are there any other considerations of significance that you feel we should have included or do you have other comments to make/points to raise with us on these issues?** **Please provide as much detail as possible to support your answer.**	N/A
Question 3: Do you agree with the items we have identified for further consideration? Are there any other significant areas that you believe should be included? If so, please include all necessary evidence to support your view.	N/A
Question 4: Do you agree with our proposal to change the authorisation regime in the 64 – 66 GHz band to licence exempt to create a common authorisation approach across the 57 – 66 GHz band for fixed outdoor installation use and that this would be a benefit to UK citizens and consumers?	N/A
Question 5: **a) Do you agree with the proposed new technical conditions in Table 6 to facilitate equipment intended for fixed outdoor installation in the 57 – 66 GHz band? Please provide evidenced views /alternatives if you**	N/A

disagree with our proposal. Do you consider any additional conditions should be mandated as part of a licence exemption to manage the interference environment? **b) Do you agree with our assessment that the proposed changes in technical conditions will have minimal impact on existing use and are appropriate to manage the future outdoor interference environment?** **c) Are there likely to be any fixed outdoor installation use cases that will require operation at eirp levels above 55 dBm? If so, please provide evidence of how the coexistence with the different outdoor users could be ensured?**	
Question 6: **a) What are the use cases and technical parameters envisaged for the 66 - 71 GHz band? Are they likely to be similar to those in the 57 – 66 GHz band? If so, what are your views on extending the same or similar technical conditions as described above for the 57 - 66 GHz band (both existing wideband data transmission (SRD) and new fixed outdoor technical conditions) to the 66 – 71 GHz band to facilitate both fixed and mobile use cases.** **b) Please provide your view on whether the technical parameters of wideband data transmission (SRD) as shown in Figure 4 are suitable to facilitate mobile/portable equipment including use outdoor? If you do not consider they are suitable, what alternative technical parameters do you think should be considered?** **Please provide as much detail to your answer as possible and your considerations on the co-existence aspects.**	N/A
Question 7: Do you agree that there is a continued need for future low capacity fixed link applications? **If so, please provide information to support your view and what alternatives you would consider appropriate should the upper 1.4 GHz**	Yes, we agree with that. Power utilities and public safety companies would like to retain existing 1.4 GHz cabling and antennas infrastructure to avoid costly upgrades migrating to new (i.e 6 or 7 GHz). In some cases such upgrades simply not possible due to the need in additional repeating sites that are not

band no longer be available. **Please provide clear evidence to support the reasons for your views.**	available. Ofcom's Fixed Wireless Strategy invites consideration of 'orphaned' fixed link band at 1350-1375 MHz for use as a TDD fixed link band in the future. As a major 1.4GHz equipment supplier in EU, SAF has studied and concluded that it is possible to customize and tune existing 1.4GHz fixed FDD product to use 1350 – 1400 MHz band. Such product would still support narrow channels from 256kHz up to 8 MHz. Providing throughputs of up to 43Mbps in SAF's opinion it would fully satisfy the demand for higher throughputs in utilities and public safety networks. At the same time will allow utilities and public safety companies to retain existing 1.4 GHz cabling and antennas infrastructure greatly reducing total cost of ownership. At the moment the problem is that 1375-1400 MHz spectrum is owned by MoD, so it would be helpful to be aware of whether there is any possibility of releasing this band in order that it could be paired with civil spectrum 1350 – 1375 MHz just below it, thereby increasing the commercial value of the whole spectrum block 1350 – 1400 MHz.
Question 8: **Do you consider there is merit in considering making the bands 52 GHz and 55 GHz available under alternative authorisation approach(es) such as block assignment? If so, what would you consider to be the best approach(es)? Please provide detailed views to support your response.**	N/A
Question 9: **Do you think we should review our authorisation approach to any other band used for fixed wireless links?**	N/A
Question 10: **a) How do you envisage W band and D band will be used for mobile backhaul provision and the likely timescales? Please provide as much detail as possible on deployment scenarios and whether this would include indoor use.**	N/A

Are there any other types of applications (other than mobile backhaul) that could be suited for these bands? **b) What are your views on the most appropriate authorisation approach for the W and D bands? Please provide as much detail and technical evidence as possible in your answer.**	
Question 11: Which capacity enhancing technique(s) are you using or planning to use? Please provide detail / evidence and clearly explain why and how each technique is planned to be used and if you consider there are any other aspects that should be considered.	N/A