

## Your response

Question	Your response
<p><b>Question 1:</b> Do you agree with our proposal to make this spectrum available for fixed links? Are there other potential users of these frequencies which we have not identified?</p>	<p>Confidential? – N</p> <p>Viasat supports Ofcom's proposal to make the 32.445-32.571 GHz and 33.257-33.383 GHz frequency bands available for fixed links. Viasat recognizes that Ofcom plans on reviewing responses to the Consultation on expanding spectrum access for fixed links in the 32 GHz (31.815-32.571 GHz / 32.627-33.383 GHz) band (“Consultation”)<sup>1</sup> before making a final decision on the future use of 28 GHz (27.5-29.5 GHz) spectrum<sup>2</sup> and that Ofcom will publish a decision with respect to both bands in a combined statement. In our response to the Ofcom consultation on increasing use of the 27.5-30 GHz band, we provided information showing the importance of the 28 GHz band for the satellite industry and urged Ofcom to open the returned 28 GHz spectrum (<i>i.e.</i> 27.8285-28.0525 GHz and 28.8365-29.06.05 GHz) for satellite gateways and land-based satellite user terminals, including land-based earth stations in motion / earth stations on mobile platforms (ESIMs aka ESOMPs).</p> <p>As the Consultation outlines with respect to fixed links, 32 GHz spectrum is broadly substitutable for 28 GHz spectrum. Satellite communications heavily rely on the core 28 GHz band for gateway and user terminal communications. Viasat highlights that currently there only a few bands where CEPT has developed ECC Decisions for harmonized use and exemption from individuals licensing of earth stations, including the 28 GHz band (as well as the Ku- and Q/V bands).</p>
<p><b>Question 2:</b> Do you agree with our proposal to make this spectrum available on an Ofcom-managed basis?</p>	<p>Confidential? – Y / N</p>

<sup>1</sup> See *Consultation: Expanding spectrum access for fixed links in the 32 GHz band*, <https://www.ofcom.org.uk/spectrum/frequencies/expanding-spectrum-access-32-ghz-band/>.

<sup>2</sup> See *Statement and consultation: Increasing use of the 27.5 – 30 GHz band*, <https://www.ofcom.org.uk/spectrum/space-and-satellites/increasing-use-of-the-27-5-to-30-ghz-band/>.

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<p><b>Question 3:</b> Do you agree that 28 and 32 GHz spectrum is broadly substitutable from a fixed links perspective? If not, please explain why this is the case and provide evidence to support your views. In particular we would be interested to understand any differences between the 28 and 32 GHz bands which could make them more or less suitable for fixed links migrating from the 26 or 40 GHz bands.</p>	<p>Confidential? – N</p> <p>As reflected in the above to Question 1, Viasat agrees that 28 GHz and 32 GHz spectrum is broadly substitutable for fixed links—but not for satellite operations.</p> <p>Viasat notes Ofcom’s decisions to revoke approximately 550 P-P fixed licenses in the 24.5-26.5 GHz band effective 31 December 2028<sup>3</sup>, as well as a decision to revoke all existing block-assigned licences in the 40 GHz band, effective 1 June 2028, for enabling the use of 6.25 gigahertz of spectrum for terrestrial IMT/5G.</p> <p>In light of these decisions, if conceivable alternative spectrum for P-P fixed links is required, the 28 GHz and 32 GHz bands are candidates for this purpose. However, as noted above, the 28 GHz band is being used extensively for satellite operations. The 32 GHz band is therefore a much more attractive option, to the extent such access is necessary—and it may not be for the reasons discussed below.</p> <p>Fixed services are mainly used by terrestrial mobile operators. Each operator that is awarded spectrum for terrestrial IMT/5G in the 26 GHz or 40 GHz band is permitted to deploy their own in-band P-P links under the current framework. In-band deployment not only ensures more efficient use of spectrum, which is often deployed in densely populated area, but also allows mobile operators the full flexibility to deploy P-P and point-to-multipoint or fixed wireless access links, without having to coordinate with other operators. Many of the mobile operators are also licensed to use a separate block of mmWave spectrum as well, which they use for fixed links. This furthers reduces the spectrum cost and increases longer term investment in these less attractive bands for mobile wide area services. Thus, for some operators migration from 26 GHz and 40 GHz may not be required.</p>

<sup>3</sup> See *Enabling mmWave spectrum for new uses*, <https://www.ofcom.org.uk/spectrum/frequencies/mmwave-spectrum-for-new-uses/#:~:text=13%20March%202023%20%E2%80%93%20Statement%20and%20further%20consultation%20published&text=We%20have%20decided%20to%20make,for%20mobile%20technology%2C%20including%205G.>

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	<p>The use of fixed links is already possible for the current mobile operators, which are also authorised in the 28 GHz band as they can already deploy their own fixed links technology overlay with access services using Integrated Access Backhaul in the mobile bands. Once awarded, the 26 GHz will also allow each licensee to deploy their own wireless backhaul services within the band.</p> <p>Dedicated fixed point-to-point links blocks in 26 GHz, 28 GHz and 40 GHz are no longer needed as MNOs have their own spectrum blocks in these ranges where they can accommodate fixed links.</p> <p>For all other fixed link requirements, including mobile operators that do not have access to their own spectrum block, the 32 GHz will be a suitable solution.</p>
<p><b>Question 4:</b> Do you agree with our provisional proposal to make 28 MHz channels and one or more 56 MHz channels available for new fixed link assignments? If not, please explain the reasons for your view and set out any preferred alternative approach.</p>	<p>Confidential? – Y / N</p>
<p><b>Question 5:</b> Do you have any additional concerns or comments regarding the proposals in this consultation document?</p>	<p>Confidential? – N</p> <p>Viasat’s view is that migration of the fixed service P-P systems from the 26 GHz and 40 GHz bands will require significant investment in equipment upgrades.</p> <p>To justify these investments, fixed link operators may be interested in considering the possibility of using bands with greater capacity than the 28 GHz or 32 GHz bands. For example, E-band, which is opened in the UK for P-P links on first come first served basis. E-band is expected to support channel sizes of up to 2 GHz.</p>

Please complete this form in full and return to [32GHz@ofcom.org.uk](mailto:32GHz@ofcom.org.uk).