Consultation title	Improving spectrum access for Wi-Fi – spectrum use in the 5 and 6 GHz bands
Representing (delete as appropriate)	Self / Organisation
Organisation name	EMEA Satellite Operators Association

Your response

Question	Your response
Question 1: Do you have any comments on our proposal to open access to the 5925-6425 MHz band for licence-exempt Wi-Fi use?	The 5925-6425 MHz band is important spectrum to fixed satellite services (FSS) for C-band (Earth-to-space) uplinks. Ofcom indicates that the band is used for satellite services in the UK: "the band is used by Transportable Earth Stations" and "there are 72 holders of Permanent Earth Station licences in the 5925-6425 MHz band in the UK (as of December 2019)." ESOA would like to emphasize that since the FSS space receivers associated with these Earth Station licenses see aggregate interference from the devices operating in the whole footprint, the protection of them requires consideration at a regional level, also taking account of the interference to satellite receivers from other countries. Furthermore, the UK has responsibilities to avoid causing interference to satellite systems serving other countries and regions – not only those used by UK based earth stations. ESOA notes that Ofcom refers to the ECC Report 302 which CEPT published in May 2019 which contains studies between WAS/RLAN systems and existing incumbents, including FSS, in the 5925-6425 MHz band and adjacent bands. The ECC, in the week of 6 March 2020, also approved its final CEPT Report 73 (Report A) on harmonised technical conditions for Wireless Access Systems including Radio Local Area Networks in the 5925-6425 MHz band for the provision of wireless broadband services. Ofcom has acknowledged that: - "CEPT expects that compatibility and coexistence are technically feasible under certain conditions (including low power, indoor-only uses) between RLANs and incumbent fixed links and satellite users";

	- “CEPT studies show that sharing between RLANs and Fixed Satellite Services (FSS) is feasible based on the agreed FSS technical parameters and a range of European RLAN deployment scenarios forecast to 2025.” Ofcom also “agree[s] with CEPT’s views on satellite sharing conditions in the band.” ESOA commends the UK Ofcom for their approach to open the 5925-6425 MHz band for license-exempt low power indoor and very low power (VLP) outdoor Wi-Fi use, in a manner consistent with the results of the CEPT studies. ESOA also acknowledges the important role that Ofcom has played in the international studies. Noting the international dimension to the potential interference to FSS satellites, ESOA respectfully requests Ofcom for their support in advocating this well-balanced approach in other CEPT countries, which is necessary to ensure that UK satellite users can continue to use this band.
Question 2: Do you have any comments on our technical analysis of coexistence in the 5925-6425 MHz band?	ESOA notes Ofcom’s statement: “Our studies suggest that sharing is feasible for up to 250mW indoor and 25mW outdoor unlicensed uses.” These power limits comply with the CEPT Reports mentioned above and ESOA considers that they are adequate to protect FSS satellite receivers, thus creating a sustainable sharing framework for the benefit of all industries and consumers in the UK.
Question 3: Do you agree with our proposal to remove DFS requirements for indoor Wi-Fi up to 200mW from the 5725-5850 MHz band?	ESOA has no comment.
Question 4: Do you have any comments on other options that may be available for Wi-Fi and RLANs within the 5 GHz band?	ESOA has no comment.