

Consultation title	Improving spectrum access for Wi-Fi – spectrum use in the 5 and 6 GHz bands
Representing (delete as appropriate)	Organisation
Organisation name	Strathclyde Partnership for Transport (SPT)

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?	<p>SPT are supporting the UITP Spectrum User Group initiative in favour of prioritising for Urban Rail Communications Based Train Control (CBTC) systems in the 5915-5935MHz band (with adequate protection from Radio LANs in the 5935-5945MHz band and from road ITS applications in the 5875-5925 MHz).</p> <p>SPT is in the process of upgrading the Glasgow Subway to an automated Communications Based Train Control (CBTC) metro system utilising the spectrum in the 5GHz band.</p> <p>SPT may wish to use the 5.9GHz band for Urban Rail ITS safety-related applications (CBTC systems) in the future.</p> <p>The Urban Rail sector requires priority over 20MHz of a contiguous spectrum which covers from 5915 MHz to 5935 MHz according to the proposed revised Electronic Communications Committee (ECC) decision submitted to Public Consultation in 2019, which means that Urban Rail ITS applications have also to be protected from RLAN operating above 5935 MHz.</p>
Question 2: Do you have any comments on our technical analysis of coexistence in the 5925-6425 MHz band?	No comment

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?	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?	No comment