



Spectrum Roadmap

Delivering Ofcom's Spectrum
Management Strategy

BT's response to the discussion document published on 31 March 2022

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BT's Comments on Ofcom's Spectrum Roadmap

We value the publication of a Spectrum Roadmap and look forward to its further development

1. BT welcomes the publication and opportunity to offer feedback on Ofcom's Spectrum roadmap¹. This discussion document details the many and varied current spectrum projects that are included in Ofcom's current work plan for 2022/23 and sets out a future work plan that addresses (i) Network evolution and convergence; (ii) Accelerating innovation and sharing with spectrum sandboxes; and (iii) Better data for spectrum management. We welcome and support the inclusion of all these things within the Spectrum Roadmap. However, whilst we agree with what is in the document, there are a few areas where we believe the document could be strengthened further, as we set out below.

Importance of defining a future spectrum pipeline for mobile data growth

2. BT is concerned that the spectrum roadmap does not set out any concrete proposals for identifying a pipeline of spectrum for public mobile networks beyond the short-term availability on mmWave spectrum and 1.4GHz downlink spectrum. This is an important omission that we hope may be remedied when Ofcom resolves comments provided by BT² and others on its recent discussion document on "Mobile networks and spectrum: meeting future demand for mobile data"³ and when the UK positions for the ITU World Radiocommunication Conference 2023 are confirmed.
3. BT welcomes the inclusion of a work item within the spectrum roadmap to develop "a cross sectoral understanding of evolving spectrum demand at 6 GHz" but would encourage Ofcom to go further in its ambition and explore what is possible in relation to future use of the band and the economic benefits of the various options available. The U6 GHz band could provide much needed additional spectrum capacity for mobile networks that would be impractical and unaffordable to deliver by other means. Making U6 GHz available for public mobile networks would result in improved quality of UK public mobile networks as it would provide a more affordable and practical means of delivering additional capacity than other options such as building very large numbers of additional smaller cells. As part of its work on U6 GHz band policy development, in addition to understanding demand from stakeholders and considering sharing with existing services, as mentioned in the Spectrum Roadmap, analysis of the economic benefits of different policy options will also be appropriate.
4. Although interest in 600 MHz for mobile is acknowledged in the Spectrum Roadmap, it does not include any work to address planning for possible future changes to DTT spectrum that may come about at some point beyond 2030, according to recent consideration of this matter by Ofcom and Government. We propose that consideration of this issue should explicitly be part of Ofcom's spectrum roadmap work. The UK Spectrum Policy Forum is planning to look at this topic and its output might be helpful to Ofcom's consideration of this issue. As a more general point, Ofcom's Spectrum Roadmap could perhaps make reference to the work of the UK Spectrum Policy Forum and willingness to consider any recommendations that may come from its work, or the output of other UK industry fora.

¹ https://www.ofcom.org.uk/_data/assets/pdf_file/0021/234633/spectrum-roadmap.pdf

² https://www.ofcom.org.uk/_data/assets/pdf_file/0024/237462/bt.pdf

³ https://www.ofcom.org.uk/_data/assets/pdf_file/0017/232082/mobile-spectrum-demand-discussion-paper.pdf

Response to market and technological trends is important

5. BT agrees with the market and technological trends that Ofcom has set out in Chapter 4 of the Spectrum Roadmap. The trends Ofcom has identified provide an important context to what the roadmap needs to ultimately deliver. It is helpful that Ofcom has set these out in the document.

Importance of international engagement as part of the spectrum roadmap

6. Many of the issues discussed in the Chapter 5 of the Spectrum Roadmap, such as 6G, will require efforts in international fora to deliver UK objectives. The Spectrum Roadmap does not include specific objectives in international fora or highlight the importance of influencing international harmonization work to underpin or support the delivery of national spectrum policy objectives. It would be useful to include within the Spectrum roadmap some details of the process that Ofcom will follow to establish specific UK objectives and positions for international meetings (ITU, CEPT etc.), including regular and ongoing engagement with UK industry, to get their views on the positions that Ofcom should take, in the final version of the document.

Support for innovation and new spectrum management techniques

7. BT is interested in Ofcom's work to look at spectrum sharing techniques, including its Spectrum Sandbox proposals and its work on more dynamic and database driven access to spectrum. We look forward to engaging in any process that Ofcom may establish to take this initiative forward. We particularly welcome the work to automate spectrum licensing processes and to review the technical conditions (i.e., power limits) in shared access licence bands. We also agree that real-world data on spectrum utilisation, including licence-exempt bands used for Wi-Fi, is important, but to be most useful would need to be sourced from the widest possible range of Stakeholders.

Next steps

8. BT looks forward to continued engagement with Ofcom as it develops and implements its Spectrum Roadmap. We also look forward to consultation proposals that Ofcom may put forward under the various specific spectrum related projects within its workplan.

