

LoRa Alliance response to the OFCOM consultation: “Ofcom’s proposed Plan of Work 2024/25”

The LoRa Alliance is sincerely grateful for the opportunity to contribute to the discourse on OFCOM's Proposed Plan of Work 2024/25. We praise OFCOM's resolute commitment to advancing wireless services across the broad spectrum of the economy, fostering growth in diverse sectors. As the landscape of telecommunications and technology continues to evolve rapidly, we recognize the pivotal role that OFCOM plays in shaping a regulatory environment conducive to innovation in the past 20 years.

Our LoRaWAN ecosystem was born in 2009, the LoRa Alliance was established in 2015, and in just a few years, LoRaWAN has emerged as the de facto global standard for Low-Power Wide-Area Network (LPWAN) IoT solutions.

We are aligned with OFCOM's vision to enhance coverage for vital wireless applications, thereby improving lives and driving business growth. Therefore, we would like to share some views on some regulatory points that are crucial for the innovations in the LPWAN IoT.

Importance of SRD Bands

Innovation in spectrum sharing and in mitigation techniques has facilitated the increased usage of Short-Range Devices (SRD) bands, specifically the bands 862-870MHz and 915-921MHz below 1GHz in Europe. With over 300 million terrestrial LoRa/LoRaWAN devices deployed worldwide, we emphasise the critical role SRD bands play in achieving the objectives for wireless services in the wider economy. Notably, in the utility sector, LoRaWAN in the 868MHz range is becoming the preferred choice for connecting hundreds of thousands of smart meters, exemplifying the versatile applications supported by these bands.

We urge OFCOM to sustain its commitment to prioritizing and safeguarding SRD bands to fuel continued growth and innovation within the wireless LPWAN IoT ecosystem.

Support for Satellite in 868MHz

The LoRa Alliance recognizes the significance of the 868MHz spectrum not only for terrestrial but also for satellite communication services. ***Acknowledging the nowadays dynamic nature of satellite communications, we recommend OFCOM's continued support for satellite communication in this frequency range 862-870MHz.***

This support is very important for finalising the CEPT spectrum regulatory work and for ensuring seamless terrestrial/satellite operations, fostering a world-class LPWAN IoT infrastructure, and contributing to the efficiency and reliability of the UK's IoT infrastructure.

Protection of 25mW in 915MHz

Recent developments in ISM bands regulation plus ECC work in SE24 and SRD/MG have highlighted the need for careful consideration in power level adjustments. The LoRa Alliance expresses concerns about proposals for a substantial allocation of spectrum dedicated with 500mW power level in the 915MHz band. ***We advocate for a balanced approach that considers the diverse needs of stakeholders, emphasizing the importance of protecting the existing 25mW limit to support the***

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coexistence of multiple devices and applications within the 915MHz band for multiple applications that are battery operated that rely on low transmit power.

In conclusion, the LoRa Alliance encourages OFCOM to maintain a strategic approach in shaping high-quality IoT networks in key sectors such as utilities, transport, and agriculture, supported by an appropriate regulatory framework. **By safeguarding SRD bands, supporting satellite communication in the 868MHz spectrum, and thoughtfully evaluating power level adjustments in the 915MHz band, OFCOM can significantly contribute to the deployment of reliable and secure IoT networks, fostering growth and innovation across the economy.**

Thank you for your attention to these crucial matters. We remain available for further discussion and collaboration.