




Increasing use of the 27.5 – 30 GHz band

BT's response to Ofcom consultation
document issued on 22 March 2024



Issue: v1.0

31 May 2024



BT Group



Introduction

BT welcomes this opportunity to provide its views on Ofcom's proposals for increasing use of the 27.5 – 30 GHz band¹.

BT may be interested to use this band in the future and is pleased to provide its views on Ofcom's proposals for its future use.

Our responses to the consultation questions are given below.

Answers to consultation questions

Question 1: Do you agree with our analysis of the case for regulatory intervention and our proposal to license satellite gateways to access 28 GHz spectrum in portions of the band not currently available for satellite gateways? If not, please provide reasons/evidence for your response.

Yes, we agree with Ofcom's analysis of the case for regulatory intervention and the proposal to license satellite gateways to access 28 GHz spectrum in portions of the band not currently available for satellite gateways. Our agreement is on the basis that although we don't know how intensively the existing spectrum access licences are used, we understand that the envisaged number of Gateways is small and would not significantly constrain the existing licensees in their ability to exploit the spectrum access licences that they hold.

Question 2: If we decide to proceed with this proposal to license satellite gateways to access 28 GHz spectrum in portions of the band not currently available for satellite gateways, do you agree with our proposal not to adjust Spectrum Access licence fees to reflect locations where we authorise future satellite gateways? If not, please provide reasons/evidence for your response.

So long as the proposed satellite gateway use has a very minor impact on the existing Spectrum Access licensees' ability to use the spectrum licensed to them, then we agree that the fees for the Spectrum Access licences needn't be adjusted.

Question 3: Do you have any further views / comments on our proposal to license satellite gateways to access 28 GHz spectrum in portions of the band not currently available for satellite gateways?

No, we have no additional comments.

Question 4: Have we correctly identified the possible uses of the returned spectrum? If not, what other potential uses should we consider?

¹ https://www.ofcom.org.uk/data/assets/pdf_file/0023/281372/statement-consultation-increasing-use-of-27-5-to-30-ghz-band.pdf

We agree that fixed links and fixed-satellite systems are the most likely use of the returned spectrum.

Question 5: As a satellite operator, are you currently constrained by the amount of spectrum available in the 28 GHz uplink and 18 GHz downlink to provide your planned and or existing satellite services to UK consumers and citizens? If so, please explain what constraints exist in each band.

We are not a satellite space station operator and therefore offer no comments on this question.

Question 6: Do you agree with our initial view that alternative use of the returned spectrum would be an allocation decision for either point-to-point fixed links or landbased satellite terminal use because it is unlikely both services can share and auctioning the spectrum is unlikely to secure optimal use? If not, please provide evidence to support your response.

Yes, we agree. Fixed links and land based satellite terminals are likely to represent the highest value uses of the returned spectrum but it is not likely to be practical to have them both share co-channel on a coordinated basis due to the density of use.

Question 7: Do you agree with our initial view to make 112 MHz at 28.8365 – 28.9485 GHz available for land-based satellite terminal use, 2 x 112 MHz for point-to-point fixed links at 27.9405 - 28.0525 GHz and 28.9485 - 29.0605 GHz and defer allocating the remaining 112 MHz of spectrum? If not, what alternative suggestions do you have?

Yes, we agree this is a pragmatic solution that would give both applications access to additional spectrum while avoiding the complexity of co-frequency sharing that would arise if both systems were to be densely deployed in the same areas.

Question 8: Do you agree with our assessment of how the returned spectrum may be authorised for fixed links and GSO and NGSO land-based satellite terminals? If not, please provide evidence to support your response.

Yes, we agree with Ofcom's assessment of how the returned spectrum may be authorised for fixed links and GSO and NGSO land-based satellite terminals. This should enable the spectrum to support multiple systems/operators and should achieve optimal and efficient use of spectrum.

Question 9: Do you have a view on demand for point-to-point fixed links in Northern Ireland and London in the frequency range 28.1925 – 28.3045 GHz paired with 29.2005 – 29.3125 GHz and our proposed approach that, if we were to decide to make this spectrum available for fixed links, would be to authorise this as Ofcom managed spectrum licensed on a first come first served basis?

BT does not have specific forecasts for fixed links demand in Belfast and London at 28GHz, but would agree that if Ofcom makes the spectrum available it would be best to have it managed by Ofcom to efficiently support multiple licensees.

Question 10: Do you have further views / comments that you wish to make in respect of this consultation?

BT has no additional comments.



31 May 2024

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