

Introduction

Wireless Broadband Alliance (WBA) is the global organization that connects people with the latest Wi-Fi initiatives. Founded in 2003, the vision of the WBA is to drive seamless, interoperable Wi-Fi services experiences within the global wireless ecosystem. The WBA's mission is to bring together global industry leaders, collaborating to accelerate the development, integration and adoption of next-generation Wi-Fi and wireless technologies to deliver business growth, through innovation, technical and standards development, and real-world deployment programs. Its key programs include NextGen Wi-Fi, OpenRoaming, 5G, 6G, IoT, Smart Cities, Testing & Interoperability and Policy & Regulatory Affairs.

Membership in the WBA includes major operators, service providers, enterprises, hardware and software vendors, and other prominent companies that support the ecosystems from around the world. The WBA Board comprises influential organizations such as Airties, AT&T, Boingo Wireless, Boldyn Networks, BT, Charter Communications, Cisco Systems, Comcast, HFCL, HPE, Intel, Reliance Jio, RUCKUS Networks, Telecom Deutschland and Turk Telekom.

WBA welcomes the opportunity to provide comments in response to Ofcom's consultation, "*Notice of proposals to make Wireless Telegraphy (Exemption) (Amendment) (No. 3) Regulations 2026*"

As you can see by our vision, mission and key goals (see <https://wballiance.com/who-are-wba/>). WBA and its members are uniquely placed to drive a future connectivity model that encompasses convergence and seamless handover between different types of networks (e.g. satellite and terrestrial, public and private, indoor and outdoor, fixed and mobile).

WBA have also set out our 6G vision (see <https://wballiance.com/6g-vision-statement/>) where we make the case why advanced licence-exempt RLAN technologies (e.g. Wi-Fi 7) are essential for 6G success. 6G will face significant indoor propagation challenges depending on the frequency bands used; high-performance Wi-Fi is the necessary mechanism to offload traffic and ensure the commercial viability of 6G architectures.

So as can be seen from above, our members have interests in promoting both Wi-Fi and mobile/IMT technologies and their use, in addition we have agreed the following general position statement on the 6 GHz band.

"WBA considers there is distinct value in both unlicensed and shared use of the 6 GHz band:

For the lower 6 GHz band, WBA recommends maintaining the global harmonization path, keeping it open for unlicensed use, following the example of 100+ countries.

For the upper 6 GHz band:

- In countries that **have already** opened the full band to unlicensed use and where a product ecosystem is established, WBA does not recommend altering the current unlicensed status.
- In countries that **have not yet** opened the full band to unlicensed use, WBA seeks to align membership perspectives on a common framework, which could include:
 - Full allocation to unlicensed use, particularly to support indoor and high-density environments.
 - Initial allocation of the full band to unlicensed use, with a defined assessment period, after which potential sharing options may be considered including hybrid approaches that meet users' requirements the best.

- Where a band split is being pursued by regulators, and there is prioritization for the different uses, WBA would support shared access, with appropriate mechanism to coordinate between the different uses (e.g. AFC), being pursued in the parts of the upper 6 GHz band which has been prioritized for public mobile networks.

WBA will continue working with its global membership on the above-mentioned framework and welcomes the opportunity to collaborate with regulators on models that maximize industry benefits from the 6 GHz band.”

WBA as an organisation is very supportive of the overall framework that Ofcom has set out for the future use of the upper 6 GHz band. Ofcom’s latest proposals could represent a pivotal moment for the future use of the upper 6 GHz band in the UK. We are also cognisant that Ofcom policy on this topic will also be influential on the world stage and may influence other countries that are still to decide on the best way forward for the use of this spectrum. Those countries will be looking to see if the framework proposed will be able to meet the near-term needs of licence-exempt Wi-Fi with the possible future introduction of high-performance mobile services and licence-exempt Wi-Fi in the UK.

We are supportive of this leadership being provided by Ofcom, and as a high-profile proponent of the advantages that AFC databases can bring, we would like to help contribute to the success of the policies outlined to enable future sharing and co-existence in the band. We believe implementing stable Exemption regulations through the proposed Statutory Instrument is a clear way forward to enable immediate access to the upper 6GHz for Wi-Fi equipment that is available on the market today whilst providing a route to enable a future priority-based band split to allow shared use of the band by both Wi-Fi and IMT operations in the future. This is a good way for UK consumers and industry to be able to benefit from any possible "multiplier effect" in wireless investment this approach may bring.

WBA looks forward to working with Ofcom as it refines these proposals. WBA also supports the evidence-based model that Ofcom remains dedicated to using in its approach to its general spectrum management responsibilities for the UK.

Your response

Question	Your response
Question 1: Do you have any comments on our drafting of the Proposed Regulations? Please give reasons supported by evidence for your views.	Confidential? – N The WBA supports the proposed Regulations and considers that they accurately implement Ofcom's policy decision to extend licence-exempt access into the 6425–6585 MHz frequency band using the same regulatory approach that has already proven successful within the Lower 6 GHz band and supports their timely adoption. The proposed Regulations will provide important regulatory certainty for manufacturers, equipment vendors, network operators, enterprises and consumers. These changes will provide the opportunity for UK consumers and industry to immediately use the extra 160MHz to improve spectrum reuse in high-density environments. increase the capacity of their networks and support demanding applications requiring predictable latency, high reliability and/or higher throughput. The WBA also welcome this exemption as an important first step in its overall proposals for the upper 6Ghz band by establishing a dedicated licence-exempt portion within the Upper 6 GHz band.
Question 2: Do you have any comments relating to any other matter in this Notice?	Confidential? – N The WBA welcomes the wider policy framework described within Ofcom's accompanying Statement. We also believe the statement provide regulatory solutions to enable standard power Wi-Fi operations using AFC across the whole 6GHz band (5925-7125 MHz). WBA support the solutions proposed to enable shared non-prioritised access to the rest of the upper 6GHz band (6585-7125 MHz) using AFC for Wi-Fi equipment that is available on the market today. WBA also support the Ofcom view that by using AFC database to provide access in the 6585-7125 MHz for Wi-Fi technologies today, Ofcom are providing a route to enable a priority-based band split to allow shared access between Wi-Fi deployed today and future mobile networks (post 2030). This approach supports both current market demand and future innovation.

Question	Your response
	WBA also support the Ofcom view that further evolutions of complementary sharing mechanisms beyond AFC should also be explored in the UK and through the various engagements OFCOM have with CEPT, ETSI and other international organisations. Maintaining alignment with international technical work wherever practical will maximise equipment availability, encourage economies of scale and facilitate international harmonisation whilst allowing the UK to continue demonstrating regulatory leadership.

Please complete this form in full and return to regulations@ofcom.org.uk.