

Your response

Question	Your response
<p>Question 1: Do you have any views on the additional option we outline to change the frequencies permitted under the 3.9 GHz licence from 3925-4009 MHz to 3800-3884 MHz?</p>	
<p>Question 2: Do you have any comments on our proposed 18-month transition period for Shared Access users?</p>	
<p>Question 3: Do you have any comments on our proposed approach to protecting Fixed Links and Satellite Earth Stations in 3800-3884 MHz?</p>	<p>In our previous reply to OFCOM’s consultation in May-July 2024 on the “Optimal use of 3.9 GHz”, GSOA expressed its concerns regarding the high-power levels of the H3G license, which were announced to be on par with commercial 5G operating in the 3.4-3.8 GHz. As mentioned in our response, coexistence between 5G commercial type services and FSS receiving Earth Stations (ES) and fixed service (FS) links operating in the C-band is extremely complicated and has led to the migration of FSS from the band 3.4-3.8 GHz. GSOA believes that this assignment of H3G in 3.8-3.884 GHz with its expected 26.000 links could lead to an equally complicated co-existence scenario if the coordination process and its underlying assumptions are not clarified.</p> <p>From this latest consultation, GSOA’s understanding is that the FSS ES and FS links protection will be ensured through the coordination approach listed in Ofw 590, which is for “Shared Access Radio Services”. Table 5 presents the coordination distance limits for the shared access radio services for inter-service coordination and mentions 287 km. We would like to confirm if that coordination trigger distance is also to be used in the case of H3G, which GSOA believes to be a suitable trigger.</p> <p>Further, in the calculation procedure in Annex 1 of Ofw 590, the values of peak antenna gain are presented for the low power and medium power licenses of the shared access radio framework: GSOA would like to ask OFCOM what is the assumed gain for the H3G case? In addition, the following statement is made:</p>

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	<p><i>“For protection of 3.8-4.2 GHz band low power Shared Access base stations, a 0 dBi omnidirectional antenna pattern is assumed.</i></p> <p><i>For protection of 3.8-4.2 GHz band medium power Shared Access base stations, an omnidirectional antenna pattern is assumed, using the antenna gain as defined by the applicant (0-16 dBi max range).”</i></p> <p>From the previous consultation, we had noted that an antenna of around 21dBi was assumed for the H3G base stations. There is therefore a notable difference with the gain considered in the shared access coordination process. We kindly ask OFCOM to clarify.</p> <p>In addition, the consultation assumes an additional 6dB correction factor to account for the fact that the H3G antennas are AAS. GSOA would like to raise the following questions and concerns:</p> <ol style="list-style-type: none"> 1. Are all antennas used by H3G AAS antennas? 2. We acknowledge that AAS antennas have time varying antenna pointing but considering that OFCOM considers the short-term interference criterion for FSS, we believe that the maximum gain should be considered without this correction factor. The alternative is to grant a license that takes into account the actual pointing of the antenna such as downtilt in a more detailed interference analysis. 3. If the values of gain are the ones used in the shared access framework (see quotes above) then they are already lower than the gain expected from H3G antennas, and no correction factor should be applied. <p>We appreciate that OFCOM aims at protecting existing links, however we would like to kindly ask for clarification on how future applications and usage of the band for FSS will be guaranteed? For example, how will an application for an FSS ES which includes the band 3800-3884 MHz be received by OFCOM in the future?</p>
<p>Question 4: Do you have any other comments for us to consider in relation to the topics raised?</p>	<p>-</p>

Question	Your response
Question 5: Do you have any comments on our impact assessment?	-
Question 6: Do you have any comments on our equality impact assessment?	-
Question 7: Do you have any comments on our Welsh language impact assessment?	-