Multi-company response

The undersigned companies, representing an important cross-section of the world's leading silicon vendors, system manufacturers, and application providers, welcome the opportunity to comment on Ofcom's innovative proposals to expand access to the 6 GHz band for mobile and Wi-Fi services. In general, we strongly support Ofcom's approach, which will help the UK to make much greater use of this important spectrum band in the near future.

> **Question 1: What interest do you have in deploying outdoor or standard power Wi-Fi or other licence-exempt RLANs in the Lower 6 GHz band? Please provide details of the types of expected deployments.**

Standard power Wi-Fi, at power levels up to 4W, is useful both indoors and outdoors. To cover a large physical footprint, a Wi-Fi network may well require power levels higher than those available for low power indoor devices. When coverage of large indoor spaces is required, standard power enables network designers to locate access points to maximise the usable signal strength for the projected number of client devices, whilst at the same time streamlining the number of network nodes. Large spaces, such as logistics centres, manufacturing facilities, university lecture halls, conference centres, transportation hubs, and indoor arenas can benefit from the availability of higher-power devices.

Outdoors, it can be a challenge to provide access points (APs) with electricity and wired connectivity, particularly as there there is no physical ceiling on which to mount equipment. By reducing the number of APs required, standard power can make it easier to deploy Wi-Fi networks outdoors in urban centres, recreation centres, university campuses, stadiums, ports and many other facilities.

For such facilities, deploying standard power Wi-Fi at 6 GHz is a straightforward means to enhance their existing Wi-Fi networks at 2.4 GHz and 5 GHz. Further, Wi-Fi is attractive because users are already well-acquainted with accessing the technology. Deploying a standard power Wi-Fi network also means that facility managers don't have to depend on mobile operators to deliver the consistent and reliable coverage and performance that users need. In the United States and Canada, where standard power Wi-Fi is available, there is strong demand from enterprises, with early notable networks deployed by the University of Notre Dame[1] and the San Francisco Giants[2], and many more on the way.

In addition, Ofcom should consider allowing more flexible equipment design, such as that which is allowed in the US and Canada. In these countries, a standard power AP indoors can have connectorized antennas and be allowed to operate in a weatherproof casing. In some deployments, such as in freezers, refrigerators, subways, and warehouses, connectorised antennas are required for operations.

> **Question 2: Are you interested in providing or developing AFC databases for use in the Lower 6 GHz band in the UK?**

The Open AFC Project, founded and managed by Broadcom, CableLabs, Cisco, Wireless Broadband Alliance, and Wi-Fi Alliance Services, has been authorised for operation in the US and Canada.[3] It has

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[1] https://news.nd.edu/news/notre-dame-stadium-becomes-first-outdoor-university-venue-to-move-to-wi-fi-6e-standard/
[2] https://www.sportsvideo.org/2024/04/24/san-francisco-giants-oracle-park-byus-lavell-edwards-stadium-tap-6-ghz-wi-fi-connectivity/
[3] https://github.com/open-afc-project

a UK-based module that can be used as a starting point for AFC. The software is completely open and available to any party.

In addition, there are eight authorised operators of AFC databases for standard power networks in the United States: Broadcom, Comsearch, Federated Wireless, Qualcomm, Sony, Wireless Broadband Alliance, Wi-Fi Alliance Services, and 3CSpectra. Canada has authorised several AFC operators, with others in the queue for approval. Some of the existing AFC providers are likely to be interested in provisioning services in the UK, and with Open AFC, new local AFC firms could also easily participate in the market.

> **Question 3: Do you have any views on the operational considerations of setting up and running AFC databases?**

Consistency with the rules in the countries that today authorise AFCs – the US and Canada - is very important. If the UK market can be accessed by AFC firms using their existing technology, with code that has already been tested and proven in the field, it will be easier for AFC providers to serve the UK market. The systems used by Canada and the US are remarkably similar, differing primarily in the spectrum frequencies that each supports. We recommend that the UK carefully evaluate the United States FCC rule on AFCs [47 CFR Part 15.407(k)(l)(m)[4]], along with OET KDB 987594[5], and Canada's RSS 248,[6] in order to align as closely as possible with these established frameworks.

> **Question 4: Do you have any views on how we should manage the approval process for AFC databases and, in particular, whether we should rely on parts of the FCC process rather than requiring the whole process to be re-run in the UK?**

Ofcom should have a bias towards a light-touch approval for AFC operators that have already been certified by the US, Canadian, or other competent national regulatory authority. Such entities have already been thoroughly vetted and have a proven track record of compliance capability. However, Ofcom will also need to ensure the AFC provider can access and retrieve data concerning incumbent operations. While this information exists in its own incumbent database, Ofcom would need to assess if it is complete and accurate, and if it is updated regularly.

Ofcom should also consider whether there is a need for a daily query into Ofcom's data to protect incumbents (i.e., how often are their changes in data?). In the US, the FCC requires fixed link operators to ensure that their licence files are current, but Ofcom needs to asses whether there is a need for that level of effort in the UK.

> **Question 5: Please provide any other comments on our proposals for extending access to standard power Wi-Fi and outdoor use, including the overall approach, any details on technical parameters and the running of the AFC databases in this band.**

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[4] https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-15/subpart-E/section-15.407
[5] Note the FCC lab has broken its guidance document into 5 parts – KDB 987594 DO1 through DO5.
[6] https://ised-isde.canada.ca/site/spectrum-management-telecommunications/en/devices-and-equipment/radio-equipment-stand-ards/radio-standards-specifications-rss/rss-248-radio-local-area-network-rlan-devices-operating-5925-7125-mhz-band

It is critical to enable standard power Wi-Fi both indoors and outdoors. Indoor standard power devices may be composite (i.e., capable of operating indoors in either low power or standard power mode). In such an instance, a device would have the conformance requirements of an indoor access point (i.e., connected to mains power, no weatherproofing, labelled for indoor only, connectorised antennas) and as such, the AFC should be able to consider the BEL in its channel availability calculation for that location. Indoor devices can be geolocated using various methods, and both their location data and accuracy level are shared with the AFC to determine channel availability. Ofcom should adopt a benchmark BEL for AFC operators to use when calculating whether indoor standard power operations might cause harmful interference to outdoor microwave links.

Question 6: Do you have any comments on our proposal to use a "phased" approach, or on the alternative to wait for European harmonisation?

We strongly endorse UK Ofcom's proposal to open the full 6 GHz band to Wi-Fi as soon as possible, understanding that there will be future consultations that may impact Wi-Fi's ability to access the Upper 6 GHz band. We urge Ofcom to act promptly on the timeline proposed in the consultation document. The Wi-Fi industry has long flagged that the 480 MHz of spectrum available in the Lower 6 GHz band is insufficient to meet the pent-up demand for advanced Wi-Fi technologies – especially for enterprise applications. The UK would experience the same strong uptake of Wi-Fi devices utilising the full 6 GHz band as has happened in the US and Canada, even considering an intent to prioritise some frequencies for MFCN toward the end of the decade.

Should a future UK Ofcom consultation result in limiting spectrum access for Wi-Fi in the Upper 6 GHz frequency range, we respectfully request that UK Ofcom simultaneously consider other mid-band spectrum that could be opened within the frequency span a Wi-Fi radio could cover to offset the reduction in spectrum availability.

In the meantime, we agree with Ofcom's view that UK citizens should not have to wait to realise the benefits that advanced Wi-Fi can deliver. A full-band solution for Wi-Fi in 6 GHz enables Ofcom to meet its connectivity goals by ensuring that broadband links will not be throttled by slow Wi-Fi, delivering immediate benefits to citizens and the economy. More than 5,000 Wi-Fi device models (either Wi-Fi 6E or Wi-Fi 7) that support 6 GHz operation were announced or made available between 2021-2024, according to Intel[7]. The benefits for end users are further demonstrated by the launch of five generations of Microsoft-based PCs, five generations of Android devices, and two generations of Apple devices supporting operation in the 6 GHz band.

To accommodate future changes in spectrum availability, there are two overarching points to keep in mind: (1) from the point of sale onward, manufacturers usually have limited oversight, and (2) there will be different potential solutions (no "one size fits all"). For example, one approach would be for ISPs to deploy access points that can push updates received from manufacturers to deployed devices. This could be effective because most consumer access points are delivered and, to an extent, managed by broadband providers. Similarly, enterprise IT teams can accept and implement updates to equipment received from manufacturers.[8] Enterprises without IT teams typically rely on third parties to design, install and maintain networks (system integrators), which can make updates to accommodate future regulatory changes.

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[7] Source: Wi-Fi Now. Intel Wi-Fi 6E/7 device model tracking is based on public information compiled from vendor/retailer websites, press releases, and third-party reviews. Intel provides this assessment for informational purposes only. Intel cannot guarantee its accuracy, and it is subject to change without notice.

[8] We do not mean to suggest that software updates are uniformly a "push" from manufacturers. Sometimes, the enterprise user must "pull" the software download from a manufacturer.

For some categories of devices (smartphones, laptops, tablets), consumers have been conditioned to receive software updates from manufacturers and update their devices accordingly, but there are limitations. One, some end-users ignore the updates. If they do, there is little the manufacturer can do to force the consumer to act. Two, end-users are not conditioned to check for and implement updates on a wide variety of consumer electronics and IoT devices in the home. Fortunately, client devices are built to communicate with access points on the frequencies that the access point has broadcast. Once access points have changed to accommodate a new spectrum access footprint, the client devices are already engineered to follow. Ofcom should, therefore, think about compliance as a function of how the access points are changing their behaviour. So, Ofcom should explicitly authorise client devices to operate over the widest frequency possible as long as such devices operate under the control of an access point. This will ultimately reduce the compliance and certification costs of client devices, which would likely be passed down to users. This could also have the added benefit of jump-starting the Upper 6 GHz market for Wi-Fi with client devices already available in other full 6 GHz band markets.

However, there may be a small number of access points where it could be challenging or unfeasible to ensure compliance with a change in future spectrum availability. For that reason, we propose Ofcom provide a "simple option" for any access point manufacturer that is concerned about future changes in spectrum access rules. The "simple option" should enable devices to be built to utilise Wi-Fi channels that will remain prioritised for Wi-Fi in the future.

We urge Ofcom to designate up to a further 320 MHz in the Upper 6 GHz band as licence-exempt with rules consistent with those for the 5925-6425 MHz frequency range. This will enable Wi-Fi manufacturers to place equipment into the market in the short term without the need for future adjustments to spectrum access. This will further support robust activity in the Upper 6 GHz band with benefits accruing to consumers, enterprises and the UK economy.

In summary, Ofcom should not dictate how devices might be modified in the future to accommodate changes to spectrum access rules. Although Ofcom will need to publicise any changes to manufacturers, ISPs, integrators and large enterprises, client devices need not be updated, as their frequency use will track that of the access points.

A "simple option," with a footprint designated in 2025 as a permanent set of Wi-Fi frequencies, should round out the ability of the industry to participate in the Upper 6 GHz deployment right from the start. Technological approaches to manage future spectrum access changes are likely to vary, and it is important to give manufacturers and users as many options as possible, including the simple one of designating spectrum to be permanently prioritised for licence-exempt use.

Question 7: Do you have any comments on the above suggestion to manage any "legacy" Wi-Fi devices, or alternative suggestions?

Please see our response to Question 6 for our recommendations on how to manage devices that might be impacted by a future change to the rules in the Upper 6 GHz band.

Note, some of the Wi-Fi devices authorised to operate in the Lower 6 GHz band may already have the capability to operate in the Upper 6 GHz band, and turning on that capability may be possible. If so, this provides an additional pathway to opening the Upper 6 GHz band to Wi-Fi use.

In addition, Ofcom could encourage networks deploying multiple access points in the Upper 6 GHz band to have a preference for using frequencies in the Lower 6 GHz near exterior walls of the buildings. Such a preference could also help eliminate issues between Wi-Fi and future users in this band by taking into account building attenuation.

Question 8: Do you have a view on the amount of spectrum that should be prioritised for Wi-Fi under the prioritised spectrum split option? Please provide evidence for your view.

In our view, the dividing line between "prioritised for Wi-Fi" and "prioritised for MFCN" should be reached in a future consultation once UK Ofcom can evaluate the outcome of Europe's engagement on the Upper 6 GHz band, now scheduled for 2027. In the mean time, as stated in response to Question 6, we believe the UK should designate now frequencies in the Upper 6 GHz band that it believes will be dedicated to Wi-Fi even after the future consultation. As discussed in our response to Question 6, this approach would enable the deployment of access points where the manufacturer has determined, for technical, economic or practical reasons, that future modifications to spectrum access for that device are not possible. We believe that if a prioritised spectrum split is to be implemented, up to a further 320 MHz dedicated for Wi-Fi, consistent with the rules for 5925-6425 MHz is the optimal solution. When combined with spectrum in the Lower 6 GHz band, this would enable, as a minimum, two 320 MHz channels, five 160 MHz channels, or ten 80 MHz channels. Moreover, industry players that will be able to execute on future changes in spectrum access can utilise the full Upper 6 GHz band now.

Question 9: Do you have any comments on our plan for a "phase 1" when Wi-Fi will be introduced?

As stated in our response to Question 6, we applaud Ofcom's vision to provide timely access to the Upper 6 GHz band, and we have a strong preference for Ofcom to enable Wi-Fi as soon as possible.

Question 10: One variation on "phase 1" would be to only authorise Wi-Fi in client devices to "seed" the market. Would you have any views on this, or suggestions for other variations?

We support Ofcom's preference to implement phase 1, including authorising access points immediately on an opportunistic basis. While authorising client devices would "seed the market", we believe that there is an immediate demand for full Wi-Fi operations in the Upper 6 GHz band as outlined above. We support Ofcom in developing the UK Voluntary National Specification (VNS), as this will allow manufacturers to enable and certify products for the market. We also suggest that, when appropriate to do so, Ofcom initiate a work item within ETSI BRAN to start development of a new ETSI EN and/or revision to EN 303 687 to incorporate Wi-Fi in the Upper 6 GHz band and Wi-Fi up to the Upper 6 GHz band-split.

We also encourage the UK to advocate for a revision of ECC Decision 20(01) "On the harmonised use of the frequency band 5945-6425 MHz for wireless access systems including radio local area networks (WAS/RLAN)" so that the Lower 6 GHz band is extended up to a further 320 MHz.

Question 11: Do you have any comments on our plan for a "phase 2" when mobile will be introduced?

Once Ofcom has reached a phase 2 decision, and assuming that some of the Upper 6 GHz band will be prioritised for mobile, entities using the Upper 6 GHz for Wi-Fi will need some time to implement the

new spectrum requirements. Given the usual timescales between a regulatory decision, followed by an assignment of spectrum, and then followed by network build-out, we don't anticipate the Wi-Fi transition will result in delays. However, we urge Ofcom to raise this issue again as part of its phase 2 consideration to ensure it has an up-to-date view. We also recommend that, during Phase 2, Ofcom carry out further study work and/or trials of potential future coordination methods and mechanisms that could enable continued operational access for enterprise and industrial networks using Wi-Fi to provide critical services at certain venues and locations within the spectrum allocated to MFCN operations after the split.

> **Question 12: Do you have a view on the amount of spectrum that should be prioritised for mobile under the prioritised spectrum split option? Please provide evidence for your view.**

It appears that the growth in demand for mobile services has slowed substantially, particularly for mobile broadband services. It is as yet unclear what role mobile networks in this spectrum might play in the future, but early tests in the UAE, where the Upper 6 GHz band has been given to two mobile operators[9], have focused on fixed wireless access (FWA)[10]. FWA services would present fewer challenges compared to mobile broadband in this band. Indeed, receivers would not be smartphones (which are battery-constrained and have low-gain omnidirectional antennas), but powered CPEs with 10-20 dB of gain thanks to directional antennas.

Meanwhile, the performance and coverage of fixed broadband networks which depend on Wi-Fi continues to improve, while enterprise use of Wi-Fi is intensifing.

We urge Ofcom to continue to gather information on these trends so that it can make a fully informed decision post 2027, noting that there is a relevant agenda item for WRC-27 on spectrum for mobile networks. Should Ofcom make a decision on prioritising some spectrum in the Upper 6 GHz band for mobile, we request that it offset any loss of Upper 6 GHz spectrum for Wi-Fi by providing access to other mid-band frequencies for Wi-Fi. Note, such spectrum would not be fungible for Upper 6 GHz spectrum as it may take 7-10 years to achieve the same market readiness that the Upper 6 GHz band has for Wi-Fi today.

> **Question 13: Do you have any evidence or views about the geographical extent of mobile networks' likely deployment in Upper 6 GHz?**

During Europe's deliberations about how to allocate the Upper 6 GHz band, mobile network operators have indicated that the Upper 6 GHz band will be deployed where 3.5 GHz IMT base stations have already been deployed; this would mean that the Upper 6 GHz would be a supplementary capacity band, deployed primarily where there may be capacity bottlenecks. We note from a field study by Telefonica and Huawei in Germany that was submitted to ECC PT1 that there is a significant disparity between downlink and uplink speeds when the user equipment is indoors, and so we anticipate that any such service on the Upper 6 GHz band would largely carry supplemental downlink traffic.[11]

> **Question 14: Do you have any comments on our proposed phased approach to authorisation of both Wi-Fi and mobile in the Upper 6 GHz band?**

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[9] Etisalat and du are majority-owned or controlled by the UAE government through sovereign wealth entities.
[10] https://www.eand.com/en/news/7-april-2025-eand-uae-redefines-5g-with-6-ghz-and-600-mhz-testing.html
[11] https://api.cept.org/documents/ecc-pt1/81128/ecc-pt1-24-005_telefonica-6-ghz-stuttgart-coverage-test-results

We support Ofcom's proposal for a phased approach for the Upper 6 GHz band enabling Wi-Fi in the spectrum as soon as possible, with phase 2 authorising mobile use in a portion of the Upper 6 GHz band linked to the outcome of discussions at a European level on harmonising how the band is used.

We also support Ofcom's proposal to allow outdoor and higher-power Wi-Fi to operate in the Lower 6 GHz band under the control of an automated database (AFC) to protect other users from interference.

Question 15: Do you have any comments on our proposal to not include very low power portable devices in the Upper 6 GHz band at this stage, but to keep this under review?

We have some reservations about Ofcom's proposal not to include very lower power (VLP) operation under phase 1, since we believe that VLP for the provision of client-to-client connectivity both indoors and outdoors is important. As mentioned above, we urge Ofcom to conclude that up to a further 320 MHz in the Upper 6 GHz band be designated licence-exempt with rules consistent with those for the 5925-6425 MHz frequency range (thus including authorising VLP operation). While we strongly agree with Ofcom's plan to move forward quickly on LPI in the Upper 6 GHz band, we also ask that Ofcom consider allowing VLP operations in the Upper 6 GHz band.

Question 16: Do you have any comments on our proposal to authorise the use of low-power indoor Wi-Fi access points and client devices to use 6425–7125 MHz?

Noting our view on VLP expressed in Question 15, we support Ofcom's proposal to allow LPI in the Upper 6 GHz band under Ofcom's proposed technical conditions.

Question 17: Do you have any comments on the proposed technical conditions?

We believe that if the prioritised band split approach is pursued, operation in the portion of spectrum prioritised for Wi-Fi should be identical to the Lower 6 GHz band, including the contention-based protocols.

In general, we have some concerns if Ofcom were to mandate contention-based (polite) protocols that deviate from the ones already utilised by the Wi-Fi specifications to minimise the potential for interference with other new and incumbent users of the band, since this could lead to a UK-centric solution.

As outlined in our responses to earlier questions, it is important that the regulatory treatment of client devices in the Upper 6 GHz band remains consistent with that in the Lower 6 GHz band, since any necessary complexity can be managed at the access point level.

We also encourage Ofcom to collaborate with industry to explore a wide range of mechanisms—from simple to more advanced—that can support diverse use cases while ensuring compliance with regulatory requirements.

Question 18: Do you have any comments on the proposed VNS draft?

We believe that the VNS and the adjustments made to the transmitter and receiver parameters to support operation in spectrum beyond 6425 MHz are reasonable.

> **Question 19: Do you have any suggestions for an appropriate mechanism for enhanced sensing, or comments on the proposed solution above?**

We suggest that Ofcom does not tie access to the Upper 6 GHz band solely to "enhanced sensing," noting enhanced sensing may not even be required in the future. Under a prioritised band split, if enhanced coexistence mechanisms are required, they would be limited to the portion of spectrum where Wi-Fi would not have prioritised access.

It is important to recognise that Wi-Fi equipment supports a wide range of use cases and is deployed by a diverse set of users. This diversity means that a single, universal mechanism for Wi-Fi to detect and avoid IMT operation in portions of the band where mobile services are prioritised is neither necessary nor appropriate.

For example, enterprise networks are typically professionally managed, and their operation can be configured to support coexistence with other users in the band without the need to implement complex sensing mechanisms at the access point (AP) level — or potentially at all.

Likewise, the majority of APs used in residential settings are provided by ISPs. All new models support protocols that enable remote monitoring and management by the ISP. Since these APs connect directly to the ISP's access network, their locations are known, allowing the ISP to ensure that operation on specific channels in the Upper 6 GHz band complies with applicable regulations. We therefore encourage Ofcom to engage with the wider ISP community to explore the feasibility and scalability of this approach.

If certain portions of the Upper 6 GHz band were to require additional technical mechanisms for compliance, these may increase the cost of APs. As a result, such mechanisms are likely to be adopted first in higher-end equipment. Many of today's premium, after-market APs already support remote monitoring and management, which suggests that regulatory compliance procedures could be developed for such devices, even in parts of the band where Wi-Fi does not have priority. We encourage Ofcom to engage with the industry to explore the feasibility and scalability of this approach.

If Ofcom were to make the decision that any type of sensing is based on an MFCN transmitting a Wi-Fi frame, then there will be a coexistence benefit for Wi-Fi equipment even without enhanced sensing, e.g., if an MFCN transmits a Wi-Fi frame with a CTS2self, it would obtain access to the channel the vast majority of the time, and would likely lead to the Wi-Fi AP moving to a different channel because it has inadequate channel access.

Should "enhanced sensing" be developed that leads to the requirement that Wi-Fi vacate a channel, then this would be layered on top of the current approach based on polite protocols. This makes sense because Wi-Fi equipment is shipping now and much of this equipment could be software updated to use enhanced sensing as long as the frame is IEEE 802.11 based and no hardware changes are required. It is important to note that if any other type of signal or frame were required, in certain cases this would likely require a hardware change, which would likely prohibit Wi-Fi from operating in the band until 2030 or later.

In summary, we believe that if further mechanisms are deemed necessary, Ofcom should explore the adoption of multiple approaches that, while ensuring compliance with the regulatory requirements, can also be pragmatic and easy to develop for various use cases.

Question 20: Do you agree with our proposal to restrict Wi-Fi from transmitting in the 6650-6675.2 MHz band to protect the radio astronomy service? Please provide any technical evidence to support your view.

We do not believe it is necessary to restrict Wi-Fi transmissions in the 6650–6675.2 MHz band across the entire UK to protect the radio astronomy service (RAS). As noted in ECC Report 364, restricting WAS/RLAN operation in this band is only one of several possible mitigation techniques, alongside alternatives such as the use of geographical exclusion or coordination zones.

As outlined in our earlier responses, the capabilities of Wi-Fi access point equipment vary, and in many cases the location of the device is known. This makes it feasible to limit operation in the RAS band only where necessary, rather than applying a blanket restriction nationwide. As an example, the AFC could be leveraged to coordinate access to the RAS band.

We encourage Ofcom to work with both industry stakeholders and the Committee on Radio Astronomy Frequencies (CRAF) to explore the feasibility of such targeted approaches, which may offer appropriate protection to radio astronomy without unduly limiting Wi-Fi deployment.

Question 21: Do you agree with our assessment of Wi-Fi coexistence with existing users of the band? If not, please provide details.

A lot of work was put into the development of ECC Report 364 on sharing and compatibility studies related to WAS/RLAN in the frequency band 6425-7125 MHz, and we fully endorse its conclusions.

Question 22: Do you have any evidence about the costs to operators of moving fixed links in and around "high density" areas (such as urban centres) to other bands?

We have not provided a response to this question.

Question 23: Do you have any comments on our initial assessment of our likely approach to coexistence between future mobile use and current users in the Upper 6 GHz band?

As mentioned in our response to Question 12, there seems to be considerable interest in FWA among the operators who are trialling IMT in the Upper 6 GHz band. Note, this specific application was not considered during the WRC-23 cycle–nor by the studies that were included in ECC Report 366.

Crucially, since WRC-23, the likely use of the band by IMT has changed, along with other assumptions, such as deployment (e.g., the use of 3.5 GHz site grid means that the percentage of base stations above the rooftop will be higher) and operation (e.g., higher power e.i.r.p.). We are carefully observing the ongoing activities in CEPT and we are pleased to see Ofcom engaging in the discussions.

Question 24: Do you have any other comments on our policy proposals or any of the issues raised in this document?

We have not provided a response to this question.