

## Your response

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<p><b>Question 1:</b> 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.</p>	<p>RESIDENTIAL: We are currently evaluating WiFi7 outdoor products for use as an optional add-on for our residential FTTP customers. Consumers of greater than 1Gbps FTTP premium packages are likely to be disappointed if they cannot get the same WiFi performance outdoors (i.e./ in their garden) as they can indoors.</p> <p>BUSINESS: We have existing outdoor installations including a large stadium and also ad-hoc short-term outdoor events. Increasingly clients are asking about WiFi7 support for both speed and client density in high footfall settings.</p> <p>For both, access to both the lower and the upper 6GHz spectrum and 320MHz channels widths will enable multi-gigabit WiFi services for customers with 10Gbps-100Gbps Fibre PON services or P2P fibre.</p>
<p><b>Question 2:</b> Are you interested in providing or developing AFC databases for use in the Lower 6 GHz band in the UK?</p>	No
<p><b>Question 3:</b> Do you have any views on the operational considerations of setting up and running AFC databases?</p>	No
<p><b>Question 4:</b> 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?</p>	No
<p><b>Question 5:</b> 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.</p>	None

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<b>Question 6:</b> Do you have any comments on our proposal to use a “phased” approach, or on the alternative to wait for European harmonisation?	<p>It feels like we are already lagging behind the US market. Waiting for European harmonisation potentially delays this further</p>
<b>Question 7:</b> Do you have any comments on the above suggestion to manage any “legacy” Wi-Fi devices, or alternative suggestions?	<p>None</p>
<b>Question 8:</b> 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.	<p>We would tend to agree with the comments in 2.24 of the consultation document, including access to a 320MHz channel in the upper band.</p> <p>In terms of evidence for this we are currently piloting the eero Max 7 WiFi router which supports the following:</p> <p>CHANNELS</p> <p>2.4 GHz: 1–13  5 GHz: 36–64, 100–144 and 149–165  6 GHz: 1–233</p> <p>FREQUENCY BANDS</p> <p>SM (2.4–2.484 GHz)  UNII 1: 5.15–5.25 GHz  UNII 2A: 5.25–5.35 GHz  UNII 2C: 5.47–5.725 GHz  UNII 3: 5.725–5.850 GHz  UNII 5: 5.925–6.425 GHz  UNII 6: 6.425–6.525 GHz  UNII 7: 6.525–6.875 GHz  UNII 8: 6.875–7.125 GHz</p> <p>CHANNEL WIDTH</p> <p>20, 40, 80, 160, 240 and 320 MHz</p> <p>In our testing we’ve been unable to replicate the end user performance that subscribers in North America and</p>

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	<p>South Korea are seeing. This will ultimately cause consumer frustration because UK consumers will see online comments from other markets about the performance they are seeing on their WiFi and ask why this is not available in the UK.</p>
<p><b>Question 9:</b> Do you have any comments on our plan for a “phase 1” when Wi-Fi will be introduced?</p>	<p>We are supportive of this as there are existing products in the global marketplace that are having to be limited/restricted for use in the UK. This would enable these restrictions to be lifted through software update/configuration</p>
<p><b>Question 10:</b> 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?</p>	<p>The market does not really need to be “seeded” as there are existing mainstream products, in use in other markets, that are being technically held back by the current restrictions</p>
<p><b>Question 11:</b> Do you have any comments on our plan for a “phase 2” when mobile will be introduced?</p>	<p>Seems sensible although some thought will need to be given for certain applications. For example, if I look at one of our current deployments in a stadium, we provide WiFi services alongside MNO’s who have 5G DAS systems in the stadium. If these were to both shift to 6GHz capable platforms, how the spectrum is shared when both are contending with large user bases would need to be considered</p>
<p><b>Question 12:</b> 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.</p>	<p>No</p>
<p><b>Question 13:</b> Do you have any evidence or views about the geographical extent of mobile networks’ likely deployment in Upper 6 GHz?</p>	<p>No</p>
<p><b>Question 14:</b> Do you have any comments on our proposed phased approach to authorisation of both Wi-Fi and mobile in the Upper 6 GHz band?</p>	<p>The phasing seems sensible and pragmatic. Full Fibre ISP’s are already starting to deploy WiFi7 CPE that is capable of using all of the 6GHz band so availability in 2025 would be welcome. Whereas I would imagine that MNO’s would need to have a rolling programme of RAN</p>

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	upgrade to exploit this spectrum - and that will naturally take some time for them to plan and execute
<b>Question 15:</b> 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?	No
<b>Question 16:</b> 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?	No
<b>Question 17:</b> Do you have any comments on the proposed technical conditions?	No
<b>Question 18:</b> Do you have any comments on the proposed VNS draft?	No
<b>Question 19:</b> Do you have any suggestions for an appropriate mechanism for enhanced sensing, or comments on the proposed solution above?	No
<b>Question 20:</b> 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.	Yes. Confidently achieving the required 20km physical separation distance seems unlikely so this exclusion seems to be required to avoid interference from WiFi AP's and Mobile Basestations
<b>Question 21:</b> Do you agree with our assessment of Wi-Fi coexistence with existing users of the band? If not, please provide details.	Yes

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<b>Question 22:</b> 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?	No
<b>Question 23:</b> 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?	No
<b>Question 24:</b> Do you have any other comments on our policy proposals or any of the issues raised in this document?	No