

Your response

Question	Your response
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.	No response.
Question 2: Are you interested in providing or developing AFC databases for use in the Lower 6 GHz band in the UK?	No response.
Question 3: Do you have any views on the operational considerations of setting up and running AFC databases?	No response.
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?	No response.
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.	No response.
Question 6: Do you have any comments on our proposal to use a “phased” approach, or on the alternative to wait for European harmonisation?	No response.
Question 7: Do you have any comments on the above suggestion to	No response.

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manage any “legacy” Wi-Fi devices, or alternative suggestions?	
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.	No response.
Question 9: Do you have any comments on our plan for a “phase 1” when Wi-Fi will be introduced?	No response.
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?	No response.
Question 11: Do you have any comments on our plan for a “phase 2” when mobile will be introduced?	No response.
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.	No response.
Question 13: Do you have any evidence or views about the geographical extent of mobile networks’ likely deployment in Upper 6 GHz?	No response.
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?	No response.

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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?	No response.
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?	No response.
Question 17: Do you have any comments on the proposed technical conditions?	No response.
Question 18: Do you have any comments on the proposed VNS draft?	No response.
Question 19: Do you have any suggestions for an appropriate mechanism for enhanced sensing, or comments on the proposed solution above?	No response.
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.	No response.
Question 21: Do you agree with our assessment of Wi-Fi coexistence with existing users of the band? If not, please provide details.	No response.
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?	The equipment and rigging costs incurred are generally straightforward to calculate when performing a like-for-like swap of fixed links. However, there are numerous hidden costs that must be considered, such as:

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	• Tower structural surveys where larger dishes are required. • Negotiating tenant site change control processes and legal fees. • Outsourced link calculation costs. • Spares holding costs (particularly if newly assigned bands are not already stocked locally). • Contracted RF expertise to assess and respond to consultations.
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?	The PLA make use of several fixed links within the Upper 6 GHz band. It is felt that there is currently insufficient information to make an informed decision about the impact of the proposed changes. The PLA does not have the resources of some of the other respondents to perform in-depth analysis, such as those submitted by BT or Huawei in the earlier consultation, and as such we rely on the authoritative details published by Ofcom. Until such a time definitive information regarding impact is available, there will naturally be concern about the viability of links moving forwards, and the timescales that we must adhere to. Given the nature of the PLA's business, we would be unlikely to accept the risks associated with remaining in the band without protection in high density areas. It is assumed alternative spectrum can be found that meets the same operational requirements as the incumbent links. Outside of high-density areas, the PLA operates fixed links which benefit from various attributes of the U6GHz spectrum (eg for 50km links over water) and as such we are pleased that these can likely remain.
Question 24: Do you have any other comments on our policy proposals or any of the issues raised in this document?	Owing to the relatively low number of Upper 6GHz links in operation, it does not seem unreasonable to request from Ofcom the levels of interference expected on incumbent fixed links. This will assist organisations such as the PLA to understand the issue at hand. Furthermore, Ofcom should be pro-active in helping incumbent fixed link operators find alternative spectrum that fits their specific use-cases, and/or reserving channels until they can be replaced.

