

Your response

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<p>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.</p>	<p>We provide and manage several different Wi-Fi systems for our staff, our railway systems, and for the public at our London Underground sites, some are indoor and some are outdoor. To avoid interference between these different Wi-Fi systems, we attempt to coordinate the allocation of Wi-Fi channels, often at the expense of the older Wi-Fi system releasing one or more channels resulting in reduced capacity. Making available the Lower 6 GHz for fixed installations in outdoor locations in the same manner as Band B would provide sufficient extra channels for our Wi-Fi systems without compromising capacity.</p>
<p>Question 2: Are you interested in providing or developing AFC databases for use in the Lower 6 GHz band in the UK?</p>	<p>Our interest is limited to within, and around, the London area. Although we may wish to contribute location information, this is a challenge as we have over 4,000 WAPs and it would be of significant effort and capital expenditure to provide the exact location details beyond stating that the coverage is within a particular railway station or railway depot.</p> <p>As an organisation, we are unlikely to attract sufficient funding to provide or develop an AFC database.</p>
<p>Question 3: Do you have any views on the operational considerations of setting up and running AFC databases?</p>	<p>We have no views on this.</p>
<p>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?</p>	<p>We have no views on how we should manage the approval process for AFC databases or on relying on FCC processes.</p>
<p>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</p>	<p>Our known needs can likely be met with low power Wi-Fi, so our commentary would be limited to ensuring that any standard power Wi-Fi system minimise interference to our low power Wi-Fi systems. This may require</p>

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<p>technical parameters and the running of the AFC databases in this band.</p>	<p>interval checking to be more frequent than once per day e.g. every 30 minutes.</p> <p>If not already done so, the granularity of geolocation data may need to be specified as GNSS-based location system may not always have sufficient coverage of the sky, and so alternative location-based mechanisms may need to be deployed to provide geolocation data.</p>
<p>Question 6: Do you have any comments on our proposal to use a “phased” approach, or on the alternative to wait for European harmonisation?</p>	<p>We have no comments on this.</p>
<p>Question 7: Do you have any comments on the above suggestion to manage any “legacy” Wi-Fi devices, or alternative suggestions?</p>	<p>We have no comments on this.</p>
<p>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.</p>	<p>We have no views on this.</p>
<p>Question 9: Do you have any comments on our plan for a “phase 1” when Wi-Fi will be introduced?</p>	<p>We have no comments on this.</p>
<p>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?</p>	<p>We have no views on this.</p>
<p>Question 11: Do you have any comments on our plan for a “phase 2” when mobile will be introduced?</p>	<p>We have no comments on this.</p>
<p>Question 12: Do you have a view on the amount of spectrum that should be prioritised for mobile under the</p>	<p>We have no views on this.</p>

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<p>prioritised spectrum split option? Please provide evidence for your view.</p>	
<p>Question 13: Do you have any evidence or views about the geographical extent of mobile networks' likely deployment in Upper 6 GHz?</p>	<p>We have no views on this.</p>
<p>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?</p>	<p>We have no comments on this.</p>
<p>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?</p>	<p>We have no comments on this.</p>
<p>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?</p>	<p>We have no comments on this.</p>
<p>Question 17: Do you have any comments on the proposed technical conditions?</p>	<p>We have no comments on this.</p>
<p>Question 18: Do you have any comments on the proposed VNS draft?</p>	<p>We have no comments on this.</p>
<p>Question 19: Do you have any suggestions for an appropriate mechanism for enhanced sensing, or comments on the proposed solution above?</p>	<p>No.</p>

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<p>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.</p>	<p>We have no views on this.</p>
<p>Question 21: Do you agree with our assessment of Wi-Fi coexistence with existing users of the band? If not, please provide details.</p>	<p>We have no views on this.</p>
<p>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?</p>	<p>We have no views on this.</p>
<p>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?</p>	<p>We have no comments on this.</p>
<p>Question 24: Do you have any other comments on our policy proposals or any of the issues raised in this document?</p>	<p>We have no comments on this.</p>