

Your response

Question	Your response
<p>Question 1: Do you agree with the prioritisation of the agenda items, as shown in Annex 5, and if not why?</p>	<p>Confidential? – N</p> <p>Ruckus Networks agrees with Ofcom’s prioritisation of the agenda items as shown in Annex 5.</p>
<p>Question 2: Ofcom is supporting the following three priority bands for IMT identification in the RRs:</p> <p>24.25 – 27.5 GHz</p> <p>40.5-43.5 GHz (as part of a wider global 37-43.5 GHz tuning range)</p> <p>66 – 71 GHz</p> <p>If you don’t agree with any of these bands, or think we should be promoting other bands, please provide justification for your views.</p>	<p>Confidential? – N</p> <p>Ofcom have previously identified the 66-71 GHz band as being suitable for licence exempt operation for both short range wideband data transmission equipment and fixed wireless systems in the following consultation:-</p> <p>https://www.ofcom.org.uk/_data/assets/pdf_file/0016/115630/Implementing-decisions-5771-GHz-band.pdf.</p> <p>In light of this action, which Ruckus supports, we do not believe that an IMT identification for the 66-71 GHz band is desirable as it would indicate a change of policy that could jeopardize investment plans for this band</p>

Question 3: What are your views on the suitability of the currently identified bands for HAPs and do you think there is a requirement for additional spectrum? Recognising that we support 26 GHz as a global band for IMT under agenda item 1.13, what are your views on the bands currently under study for HAPs, both globally and in ITU-R Regions?

Confidential? – N

No response.

Question 4: What are your views on the bands within scope of Agenda Item 1.16 and their suitability for Wi-Fi and Wi-Fi like services? Do you agree that Ofcom should support the CEPT position of No Change? If not, please provide evidence to support your view.

Confidential? – N

Ruckus Networks agrees with the CEPT position of No Change for the 5250-5350 MHz, 5350-5470 MHz and 5850-5925 MHz bands. However, Ruckus Networks believes that changes are appropriate in the 5150-5250 MHz and 5725-5850 MHz bands.

In relation to the 5725-5850 MHz band, Ruckus Networks would like to re-iterate its position stated in our response of 11th April 2017 to Ofcom's 5.8 GHz Statement as we believe the points highlighted in that response are still valid in this context.

In relation to the 5150-5250 MHz band, Ruckus Networks supports the removal of the indoor only restriction. Ruckus Networks believe that mitigation techniques such as antenna elevation angle and registration/notification of deployments greater than 1000 access points will safeguard the MSS links. Whilst alignment with the power levels seen in North America of 1 W e.i.r.p. would be welcome, we recognise that keeping the power level at 200 mW e.i.r.p. would act as a further mitigation technique and consequently we would support adoption of this lower power level.

<p>Question 5: Do you agree that UK support the inclusion of the updated Recommendation M.1849-1 (“Technical and operational aspects of ground-based meteorological radars”) in footnote No.5450A? What are your views on the requirement to include a reference to ITU-R Recommendation ITU R M.1638 1 in footnotes No.5447A and 5.450A and the potential impact upon Wi-Fi (and similar technologies)?</p>	<p>Confidential? – N</p> <p>Ruckus Networks supports the proposed revision to footnote No.5450A for the inclusion of Recommendation M.1849-1.</p> <p>However, we do not support the inclusion of Recommendation M.1638-1 in footnotes 5447A and 5450A as this represents an additional burden on current DFS deployment by adding radars that have been designed to be deliberately difficult to detect. Having a requirement that mass-market products, such as Wi-Fi, can detect sophisticated military radars that are designed to be hard to detect, is counterproductive to both parties in that its defeats one of the primary operational aims of these radars, i.e. to avoid being detected; whilst also reducing the traffic carrying capability and spectrum utilisation for Wi-Fi as the more complex the DFS algorithms become the increased likelihood there is of false detects.</p>
<p>Question 6: Do you agree that UK support a position of not making changes to the Radio Regulations to reference specific bands for M2M/IoT usage?</p>	<p>Confidential? – N</p> <p>No response.</p>
<p>Question 7: What are your views on the potential removal of the limitations listed above?</p>	<p>Confidential? – N</p> <p>No response.</p>

Question 8: What are your views on the approach we are proposing to take in respect of ESIMs and are there any additional factors that you think we should take into account?	Confidential? – N No response.
Question 9: What are your views on the establishment of regulatory provisions, in Article 22, that cover non-GSO operation between 37.5 and 51.4 GHz?	Confidential? – N No response.
Question 10: What are your views on the various issues under consideration under Agenda Item 7, particularly in respect of the bringing into use of non-geostationary satellite networks (i.e. Issue A)?	Confidential? – N No response.
Question 11: What are your views on Agenda Item 9.1.1?	Confidential? – N No response.
Question 12: What are your views on the potential establishment of satellite pfd limits, in the 1 452 – 1 492 MHz band, to protect terrestrial use?	Confidential? – N No response.

<p>Question 13: Do you have any views on the bands being studied and are there any other considerations which you think should be taken into account? What are your views on the appropriateness of the current emission limits in the band 3 700 – 4 200 MHz?</p>	<p>Confidential? – N</p> <p>Ruckus Networks has previously noted in Ofcom’s Annual plan for 2018-19 the intention to consult on the 3.7-4.2 GHz band:-</p> <p>“Shared access in 3.8 to 4.2 GHz: We will continue our work to enable greater shared access in this band. In doing so our aim is to protect existing users of the band while also promoting access for new users. We will consult on proposals, including consideration of the appropriate authorisation mechanism and database solutions for dynamic spectrum access.”</p> <p>With this plan in mind, Ruckus Networks would encourage Ofcom not to agree to any changes in the current emission limits and other requirements in this band until such time as the above consultation has run its course.</p>
<p>Question 14: Do you agree that no changes to the RRs are required, under Agenda Item 9.1.7, and that managing the unauthorised operation of earth station terminals (deployed within its territory) should be addressed by the national administration concerned?</p>	<p>Confidential? – N</p> <p>No response.</p>
<p>Question 15: What are your views on the need for additional fixed satellite service allocations in the band 51.4 – 52.4 GHz?</p>	<p>Confidential? – N</p> <p>No response.</p>

Question 16: What are your views on Agenda Item 1.8, particularly the need to enhance maritime safety, set against the need to respect the international spectrum allocations and the protection of passive services in adjacent bands?	Confidential? – N No response.
Question 17: What are your views on Agenda Item 1.9.1, particularly the need to respect the current integrity of the AIS?	Confidential? – N No response.
Question 18: What are your views on Agenda Item 1.9.2, particularly the need to take into account current national users in the bands defined by RR Appendix 18?	Confidential? – N No response.
Question 19: What are your views on Agenda Item 1.10 and do you think that any changes to the Radio Regulations may be necessary?	Confidential? – N No response.

Question 20: What are your views on Agenda Item 1.11, and do you agree that no specific identification for rail communications is required in the Radio Regulations?	Confidential? – N No response.
Question 21: What are your views on Agenda Item 1.12 and do you agree that there is no requirement for specific identification to ITS in the Radio Regulations?	Confidential? – N No response.
Question 22: What are your views on Agenda Item 9.1.4 concerning radiocommunications for sub-orbital vehicles?	Confidential? – N No response.
Question 23: What are your views on Agenda Item 1.1, recognising that licensed amateur operators in the UK already have access to parts of the 50 – 54 MHz band?	Confidential? – N No response.
Question 24: What are your views on Agenda Item 1.2 concerning power limits for MetSat, Mobile Satellite and EESS, and the linkage to agenda item 1.7?	Confidential? – N No response.

Question 25: What are your views on Agenda Item 1.3, particularly on any limits required to protect terrestrial use?	Confidential? – N No response.
Question 26: What are your views on Agenda Item 1.7 considering spectrum needs for short duration satellites, noting also the potential linkages to Agenda Item 1.2?	Confidential? – N No response.
Question 27: What are your views on Agenda Item 1.15, particularly on the protection needs of passive services?	Confidential? – N No response.
Question 28: What are your views on Agenda Item 9.1.6, particularly on the categorisation of WPT and whether WRC action is required?	Confidential? – N No response.
Question 29: Do you have any comments concerning the Standing Agenda Items, where not covered elsewhere in this document?	Confidential? – N No response.

<p>Question 30: Are you aware of any specific issues, not covered elsewhere in this document, which are likely to be raised in this part of the Director’s Report and of which you think Ofcom should be aware?</p>	<p>Confidential? – N</p> <p>No response.</p>
<p>Question 31: Do you have any comments on Agenda Item 9.3 considering Resolution 80?</p>	<p>Confidential? – N</p> <p>No response.</p>
<p>Question 32: What changes to the Radio Regulations have you identified that would benefit from action at a WRC and why? Do you have any proposals regarding UK positions for future WRC agenda items or suggestions for other agenda items, needing changes to the Radio Regulations, that you would wish to see addressed by a future WRC?</p>	<p>Confidential? – N</p> <p>Ruckus Networks does not believe that the 5925-6425 MHz band, which is current being progressed under an EC Mandate, or the wider 5925 – 7125 MHz band, requires a new Agenda Item for consideration at WRC-2023 as previous WRCs have already agreed a MOBILE allocation for this frequency range. Consequently, Ruckus Networks would urge the UK to oppose any attempts to have a new Agenda Item associated with either the 5925-6425 MHz band or the wider 5925-7125 MHz band.</p>