



iWireless Solutions Ltd Response to Ofcom's Consultation "Enabling Opportunities for Innovation"

12/03/2019

iWireless Solutions
Independent House
Imberhorne Lane
East Grinstead, West Sussex
RH19 1TU

iWireless Solutions Ltd welcomes the opportunity to respond to Ofcom’s consultation “Enabling Opportunities for Innovation”.

iWireless Solutions Ltd (iWireless) is a leading wireless systems integrator. We provide wireless consultancy, audit, design, installation and maintenance services for Cellular, Wi-Fi and other wireless technologies. Many of our solutions provide cellular coverage and capacity in complex indoor environments where there is often poor penetration from external cell sites.

iWireless is supportive of the Market Expansion Model proposed in DCMS’s Future Telecoms Infrastructure Review (FTIR) and agree that this “has the potential to deliver the best outcomes in terms of 5G investment, innovation and availability”. The FTIR states DCMS would “encourage Ofcom to assess the feasibility, costs and benefits of potential flexible licensing models, and also consider the trade-offs involved, as part of its continuing consultation on the planned release of spectrum in the 3.6 – 3.8 GHz band”, however we see little evidence that Ofcom has carried out this assessment in its consultation document on the release of this band. We note that Ofcom has plans to allow shared access in the 3.8 – 4.2 GHz band, however as DCMS states “this band is used by satellite earth stations and the Government understands that it may be a number of years until this band is widely available in consumer handsets and other 5G equipment, compared with the 3.6 – 3.8 GHz band and other bands harmonised for 5G in Europe”.

We are also supportive of IET’s 5G Further Faster (5G-FF) initiative. 5G-FF has outlined a number of options for enabling shared spectrum access, including setting aside a small amount of spectrum in this band for innovation, and a policy roadmap for evolving from temporary spectrum loans to dynamic spectrum access. 5G-FF’s focus is mainly on rural coverage, however the proposed options are also valid for indoor coverage where spectrum can potentially be underutilised, as indicated in the FTIR.

It is important that mobile operators support any spectrum sharing arrangements, so that mobile users experience a consistent service as they roam between networks provided by operators and by 3rd parties. This is particularly relevant for 3rd party indoor solutions which may provide services in areas immediately adjacent to outdoor areas with operator-provided services.

Answers to the specific questions in the consultation document are given below.

Question 1: (Section 3) Do you agree with our proposal for a single authorisation approach for new users to access the three shared access bands and that this will be coordinated by Ofcom and authorised through individual licensing on a per location, first come first served basis? Please give reasons supported by evidence for your views.

We agree with a single authorisation approach, however we believe these bands will have little impact within the next few years because of the lack of available spectrum at 1800 and 2300 MHz, and it is likely to be a long time before equipment is readily available at 3.8 – 4.2 GHz.

Question 18: (Section 8) Do you agree with our proposal for the Local Access licence? Please give reasons supported by evidence for your views.

We agree that Ofcom should provide licences for local access to awarded spectrum provided the proposed sharing does not affect the incumbent licensee’s planned use of the spectrum. Potential uses include indoor environments where there is good RF isolation from outside, such as within thermally efficient buildings. The availability of shared spectrum would promote DCMS’s Market Expansion Model and help to fill coverage gaps in rural areas and indoors.

Question 19: (Section 8) Do you have any other comments on our proposal?

We believe the proposed process is acceptable as a starting point, however it is slow and unlikely to facilitate widespread usage by 3rd parties. Ofcom should therefore move as quickly as practicable to a “prior approval” approach followed by automation, as outlined by IET 5G-FF, using rules agreed with the mobile operators.

We have no comment on the other questions.