Federated Wireless Inc. Response to Ofcom's Consultation:

"Award of the 700 MHz and 3.6-3.8 GHz spectrum bands"

Federated Wireless Inc. (Federated Wireless) hereby submits comments in response to Ofcom's consultation entitled, "Award of the 700 MHz and 3.6-3.8 GHz spectrum bands." We appreciate the opportunity to share our experience in implementing dynamic spectrum sharing in the 3.5 GHz band in the United States and offer our perspectives on how this same technology can be readily deployed to meet Ofcom's goals for the 700 MHz and 3.6-3.8 GHz bands in addition to others.

Federated Wireless believes that dynamic shared technology, combined with multiple tiers of commercial access, should be implemented in these bands to enable Ofcom to meet its policy goals of paving the way for the introduction of the next generation of mobile technology by multiple providers and encouraging investment and the development of a robust ecosystem. There is sufficient spectrum in the 3.6-3.8 GHz band, in particular, to license multiple operators on a licensed basis and still provide ample spectrum for opportunistic or unlicensed access. Together licensed and opportunistic shared access assure the largest possible ecosystem for equipment and devices, resulting in more choice and lower cost for network operators as well as end users.

Federated Wireless has submitted comments in Ofcom's consultation entitled, "Enabling opportunities for innovation," in which we provide details on the benefits of dynamic shared access technology. We believe that implementing a shared approach in the bands identified for the introduction of new wireless technology will best address Ofcom's policy objectives. Dynamic sharing technology is available today that can be readily adapted to meet the unique challenges of the U.K. market. A combination of both licensed and opportunistic access to sufficient spectrum will be necessary to drive the development of a large ecosystem and the widespread deployment of 5G technologies and services.