



iWireless Solutions Ltd Response to Ofcom's
Consultation "Award of the 700 MHz and 3.6-3.8 GHz
spectrum bands"

12/03/2019

iWireless Solutions Ltd welcomes the opportunity to respond to Ofcom’s consultation “Award of the 700 MHz and 3.6-3.8 GHz spectrum bands”.

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 5: (Section 7) Do you agree with our proposal to use a CCA design for this award?

We are supportive of DCMS’s FTIR and the view of IET 5G-FF that Ofcom should assess the feasibility, costs and benefits of potential flexible licensing models as part of its consultation on the release of spectrum in the 3.6 – 3.8 GHz band. Options to be considered should include setting aside 10-20 MHz of this band for innovation.

We have no comment on the other questions.