

## Your response

Question	Your response
<p><b>Question 1: (Section 2) Do you have any comments on our assessment of potential use cases, demand and deployment strategies for new uses of mmWave spectrum?</b></p>	<p><i>Is this response confidential? – No</i></p> <p><i>mmWave 5G applications can assist with the impact of rapid urbanisation by providing solutions to traffic congestion, long commute times, and poor air quality. It will enable connected transport environments, including V2X communication, connected cars and public transport systems, and intelligent transportation systems. To that end it is important that certainty with regards to the use of spectrum is provided so as to facilitate investment and foster innovation.</i></p> <p><i>It is anticipated that while MNOs look to leverage their macrocell infrastructure initially, in order to enable ITS use cases where densification is needed, there will be the need to work with Transport Bodies and Local Authorities for the deployment of shared or neutral host networks. The same might need to happen even in rural environments where existing MNO coverage is poor but where ITS use cases apply (for example Motorways or A roads). This will be particular important following the launch of the UK Digital Strategy where there is a pledge for 99% gigabit connectivity.</i></p>
<p><b>Question 2: (Section 2) Do you have any comments on our proposed overall approach to mmWave spectrum (including our aim to make the 26 GHz and 40 GHz bands available for new uses on the same or similar timeframe)?</b></p>	<p><i>Is this response confidential? – No</i></p>
<p><b>Question 3: (Section 3) Do you agree with our approach of specifying high and low density areas in the UK, and authorising new uses differently in those areas?</b></p>	<p><i>Is this response confidential? – No</i></p> <p><i>The approach of specifying high- and low-density areas is reasonable. We think there is a potential conflict with use cases in transport where transport networks span the country and</i></p>

	<p><i>hence may require certainty around the allocation of spectrum both in high- and low-density areas.</i></p>
<p><b>Question 4: (Section 3) Do you agree with our overall authorisation approach in high density areas for the 26 GHz band (i.e. to grant Shared Access licences on a first come, first served basis for the bottom 850 MHz of the 26 GHz band, (24.25-25.1 GHz), and to auction citywide licences for the rest of the 26 GHz band (25.1-27.5 GHz))?</b></p>	<p><i>Is this response confidential? – No Yes, this approach is reasonable</i></p>
<p><b>Question 5: (Section 3) Do you agree with our overall authorisation approach in low density areas for the 26 GHz band (i.e. to grant Shared Access licences on a first come, first served basis)?</b></p>	<p><i>Is this response confidential? – No As indicated in Question 3 there is a potential conflict with use cases in transport where transport networks span the country and hence may require certainty around the allocation of spectrum both in high- and low-density areas.</i></p>
<p><b>Question 6: (Section 3) Do you agree with adopting a similar approach to authorising the 40 GHz band as our proposals for the 26 GHz band, if we were to decide to re-allocate the 40 GHz band?</b></p>	<p><i>Is this response confidential? – No</i></p>
<p><b>Question 7: (Section 4) Do you agree with our proposed methodology for identifying and defining high density areas?</b></p>	<p><i>Is this response confidential? – No Approach is generally reasonable. We would have to note the absence within Table 4.3 of any mention to the Roads Network particularly for those with a lot of traffic and/or junctions.</i></p>
<p><b>Question 8: (Section 4) Do you agree with our proposed cut-off point of 40 high density areas?</b></p>	<p><i>Is this response confidential? – No The cut-off seems reasonable, and it looks like it includes major transport hubs. As mentioned in our Answer to question 7 it would be great to see how many major roads/heavy traffic junctions are included within this cut-off.</i></p>

<p><b>Question 9: (Section 5) Do you agree with our proposal to clear the fixed links in and around high density areas from the 26 GHz band?</b></p>	<p><i>Is this response confidential? – No</i></p>
<p><b>Question 10: (Section 5, Annex 8) Do you agree with our estimates of the cost of migrating fixed links into alternative spectrum bands?</b></p>	<p><i>Is this response confidential? – No</i></p>
<p><b>Question 11: (Section 6) Do you agree with the proposed approaches we have outlined to manage coexistence between new 5G users and the different existing users in the 26 GHz band? In particular, do you have any views on our proposals to limit future satellite earth stations in this band to low density areas only, and to end access to this band for PMSE users with five years’ notice?</b></p>	<p><i>Is this response confidential? – No</i></p>
<p><b>Question 12:(Section 7) Do you agree with our initial assessment on which option for enabling the 40 GHz band for new uses would best achieve our objectives?</b></p>	<p><i>Is this response confidential? - No</i></p>
<p><b>Question 13: (Section 7, Annex 8) Do you agree with our analysis of the impact on existing 40 GHz licensees, including our estimates of the cost of moving fixed links under the options involving revocation (options 2, 3 and 4)?</b></p>	<p><i>Is this response confidential? – No</i></p>
<p><b>Question 14: (Section 8) Do you have any comments on our high-level Shared Access proposals (including technical and non-technical licence conditions and proposed approach to setting fees)?</b></p>	<p><i>Is this response confidential? – No</i> These are reasonable</p>
<p><b>Question 15: (Section 8) Do you agree with the overall approach we have set out to coordination and coexistence between new Shared Access users in the 26 GHz band and existing users?</b></p>	<p><i>Is this response confidential? – No</i></p>

<b>Question 16: (Section 9) Do you have any comments on our initial thinking in relation to auction design?</b>	<i>Is this response confidential? – No</i>
<b>Question 17: (Section 10) Do you have any comments on the licence duration options we have considered in this section for new licences for the 26 GHz and 40 GHz bands that we would auction?</b>	<i>Is this response confidential? – No 15 years is a reasonable timeframe and most intelligent transport communication systems are designed and tendered for 10+5 year contracts.</i>
<b>Question 18: (Section 11) Do you agree with our assessment of potential competition concerns and that it may be appropriate to impose a competition measure such as a 'precautionary cap'?</b>	<i>Is this response confidential? – No</i>

Please complete this form in full and return to [mmwave.allocation@ofcom.org.uk](mailto:mmwave.allocation@ofcom.org.uk)



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