

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>Forenote: Comments included in this response represent majority of the WBA members. Note that not all WBA members support all stated positions in these comments.</p> <p>WBA is a not-for-profit organization and has been active in Wi-Fi space since its inception in 2003. WBA’s vision is to drive the seamless and interoperable services experience via Wi-Fi within the global wireless ecosystem for carriers, consumers, enterprises and cities.</p> <p>WBA is highly supportive of Ofcom for its activities around radio spectrum planning. WBA appreciates the opportunity to provide input on WRC-23 related positions.</p> <p>WBA endorses Ofcom’s designation of the WRC-23 agenda item 1.2 as high priority. License exempt use of the 6 GHz band has been repeatedly identified by some UK organisations through the recent COVID-19 pandemic as critical to meeting the needs of data communication. There has been a persistent growth in connectivity and data communication need, and Wi-Fi has served as an economical technology that is readily available to UK consumers and enterprises. It is not a surprise that radio spectrum needs for Wi-Fi have to grow even for the current generation of Wi-Fi (Wi-Fi 6E) to enable multiple non-overlapping 160 MHz channels which is essential for providing gigabit connectivity in high-density deployments. The upcoming Wi-Fi 7 with its support for 320 MHz-wide channels only increases this need further.</p> <p>WBA, therefore, respectfully asks Ofcom to support a “No Change (NOC)” regarding IMT identification of the 6425-7025 MHz and 7025-7125 MHz bands at WRC-23 and, in doing so, support regional and international harmonisation of this band for Wi-Fi deployments.</p>

<p>Question 2: What are your views on the continued need to protect global aeronautical and maritime services, in the 4.8 – 4.99 GHz band, under this agenda item?</p>	<p>Confidential? – N No comment</p>
<p>Question 3a: Do you agree that the UK interest in the bands 3 600-3 800 MHz and 3 300-3 400 MHz in Region 2 (North & South Americas) should be limited to any impacts on UK operational use in those areas?</p>	<p>Confidential? – N No comment</p>
<p>Question 3b: Do you agree that the UK should maintain its objections to changes to the regulatory environment for the band 3300-3400 MHz (in Region 1, Europe, Africa, Middle East), noting UK has interests in use of radar for both ground and airborne operations?</p>	<p>Confidential? – N No comment</p>
<p>Question 3c: What is your view on the use of 6425-7025 & 7025-7125 MHz, and what evidence do you have to support this view? How does that inform your views on a IMT identification in these bands?</p>	<p>Confidential? – N</p> <p>Forenote: Comments included in this response represent majority of the WBA members. Note that not all WBA members support all stated positions in these comments.</p> <p>WBA has published best practices for Wi-Fi deployment in the home, in public arenas, and in enterprises. WBA has also enabled Wi-Fi technology trials in the UK and around the world. Wi-Fi has come a long way from when WBA started to now, where the vast majority of consumer data is transported over Wi-Fi links.</p> <p>Following are the key reasons that in WBA’s view demand continued attention for this technology that has become an essential and critical element of our daily lives:</p> <ol style="list-style-type: none"> 1) With the increases in the number of users and uses, higher data rates are needed to keep up with modern apps. While Wi-Fi has grown from a niche technology in the early 2000s to the predominant wireless local connectivity technologies, radio spectrum allocation has not kept up. Access to the 6425-7025 MHz and 7025-7125 MHz bands means that up to seven 160 MHz channels can be enabled, which are critical for enabling high-data rates in

	<p>dense deployments. For enterprise deployments, it is not only the very wide channels that are important but a) the large number of channels 1200 MHz of spectrum will make available and b) the diversity of channel widths (from 20 MHz to 160 MHz) which allows enterprises to allocate channels or groups of channels to applications and services, depending on their QoS requirements (e.g., data rate, latency, and availability).</p> <p>2) As a mobile allocation exists for the entire 6425-7125 MHz band, an IMT identification of the 6425-7025 MHz and 7025-7125 MHz bands is not required. The status quo provides administrations with absolute freedom of choice of the future use of the 6425-7125 MHz band. An IMT identification on the contrary would pre-determine the future use of the band to be licensed as it has been the case for many other bands that have been identified for IMT.</p> <p>3) As studies by 6 GHz IMT proponents such as Coleago have highlighted, it would probably take ten years for IMT deployments in the 6425-7125 MHz band to be realised. Wi-Fi, on the other hand, is ready to be deployed immediately and deliver economic benefits for all UK users.</p> <p>For the reasons mentioned above, WBA respectfully recommends that Ofcom support “No Change (NOC)” of the current designation of the 6425-7025 MHz band in Region 1 and the 7025-7125 MHz worldwide.</p>
<p>Question 3d: What are your thoughts on the current UK view that IMT should not be identified in Region 2 in the band 10-10.5 GHz in order to ensure the protection of the globally operating EESS (active) systems and airborne & vessel mounted radars?</p>	<p>Confidential? – N</p> <p>No comment</p>
<p>Question 4: Do you agree that, where no additional technical limitations are placed on mobile services, the UK can support an upgrading of the mobile allocation, in 3600 - 3800 MHz, from secondary to primary?</p>	<p>Confidential? – N</p> <p>No comment</p>

<p>Question 5: What are your views on the development of regulatory conditions to facilitate deployment of high altitude IMT base stations in IMT identified bands below 2.7 GHz?</p>	<p>Confidential? – N No comment</p>
<p>Question 6: Do you agree that a formal modification to the Radio Regulations is not needed for fixed service applications that use IMT technologies?</p>	<p>Confidential? – N No comment</p>
<p>Question 7: What are your views on the proposed approach for 470-694 MHz, recognising the national decisions already in place and taken for DTT multiplex licensing in the band, and the additional and supplementary spectrum made available for UK PMSE usage?</p>	<p>Confidential? – N No comment</p>
<p>Question 8: What are your views on the need to establish an international regulatory environment that provides adequate protection of UK fixed links from earth stations in motion, in the band 12.75 – 13.25 GHz, which is also practicable from an enforcement/implementation perspective?</p>	<p>Confidential? – N No comment</p>
<p>Question 9: Do you agree that the UK continues to support the maritime distance figure for ESIMs that work to non-geostationary satellites and to test the other conditions agreed at WRC-19 for ESIMs working to geostationary satellites to ascertain whether these remain appropriate for non-geostationary satellites?</p>	<p>Confidential? – N No comment</p>
<p>Question 10: What are your views on whether an allocation to inter satellite links is necessary for existing satellite allocated bands and whether this would provide benefits internationally?</p>	<p>Confidential? – N No comment</p>
<p>Question 11: What are your views on the need for additional satellite allocations in support of narrowband IoT “M2M” type applications, noting that there remains the</p>	<p>Confidential? – N No comment</p>

continued use of PMSE for wireless cameras in the band 2010 – 2025 MHz?	
Question 12: What are your views on the proposed approach to this agenda item concerning the fixed satellite service in 17.3-17.7 GHz in Region 2?	Confidential? – N No comment
Question 13a: On Topic B, what are your views on the post milestone procedures for non-geostationary satellite systems?	Confidential? – N No comment
Question 13b: On Topic L, what are your views on regulatory conditions for Telemetry, Tracking and Command (TT&C) for NGSO in-orbit servicing?	Confidential? – N No comment
Question 13c: What are your views on the remaining topics currently listed for Agenda Item 7?	Confidential? – N No comment
Question 14: Noting that any UK position will be developed only after the ITU Plenipotentiary Conference, do you have any comments relating to the use of Article 48 that may be addressed at WRC-23?	Confidential? – N No comment
Question 15: What are your views on the need to establish an international regulatory environment for sub-orbital vehicles, which at the same time does not limit flexibility of spectrum options, and retains international safety considerations?	Confidential? – N No comment
Question 16: Do agree that where the adjacent band compatibility issues are addressed and ICAO coordination processes are not compromised, that the addition of an aeronautical satellite (AMS(R)S) allocation to the band can be supported?	Confidential? – N No comment
Question 17: Do agree that functions related to international aviation safety are a matter for ICAO? On this basis, and absent any contrary information from ICAO, should the UK support the development of an international spectrum regulatory framework	Confidential? – N No comment

<p>for UA use of FSS that would support efficient use of spectrum?</p>	
<p>Question 18: Recognising the recent diminishing industry interest in this item relating to possible modification of the aeronautical HF assignment plan, and the general lack of global interest, do you agree that UK move towards a No Change proposal under this agenda item?</p>	<p>Confidential? – N No comment</p>
<p>Question 19: What are your views on the need for additional spectrum, specifically in the 15 and 22 GHz bands, for non-safety aeronautical use?</p>	<p>Confidential? – N No comment</p>
<p>Question 20: What are your views on Agenda Item 1.11 and the proposed UK position to support modernisation of GMDSS?</p>	<p>Confidential? – N No comment</p>
<p>Question 21: What are your views on the approach to the review of 1240-1300 MHz, recognising that discussions concerning future satellite navigational needs for the UK are a matter for Government?</p>	<p>Confidential? – N No comment</p>
<p>Question 22: What are your views on a new spectrum allocation in the 40-50 MHz range to support and enhance climate monitoring, such as, environmental shifts in ice sheets?</p>	<p>Confidential? – N No comment</p>
<p>Question 23: What are your views on upgrading the Space Research Service allocation, from secondary to primary, in the 14.8-15.35 GHz band?</p>	<p>Confidential? – N No comment</p>
<p>Question 24: What are your views on the potential for defragmentation in this band to facilitate both EESS (passive) use and provide for larger contiguous blocks for fixed & mobile allocations?</p>	<p>Confidential? – N No comment</p>
<p>Question 25: Do you agree that formal international recognition for Space Weather Sensors should be implemented in the Radio Regulations?</p>	<p>Confidential? – N No comment</p>

Question 26: What are your views on the limits proposed to protect EESS (passive) under Agenda Item 9.1 topic d) and do you have any views on which of these limits might be accommodated in the Radio Regulations and how?	Confidential? – N No comment
Question 27: Do you agree that the formalised time reference in common global use, is not a matter of spectrum regulation?	Confidential? – N No comment
Question 28: Do you have any comments concerning the Standing Agenda Items, where not covered elsewhere in this document?	Confidential? – N No comment
Question 29: Do you have a view on any of the footnotes to which UK is a party?	Confidential? – N No comment
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?	Confidential? – N No comment
Question 31: Do you have any comments on Agenda Item 9.3 considering Resolution 80?	Confidential? – N No comment
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?	Confidential? – N No comment
Question 33: What are your views on the use of IMT stations that use antennas that consists of an array of active elements, in bands shared with satellite services?	Confidential? – N No comment

Please complete this form in full and return to wrc-23.respond@ofcom.org.uk.