

Your response

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<p>Question 1: Do you have any comments on our proposal to make Medium Power licences (42 dBm EIRP, up to 10m height) commonly available in urban areas across most of the UK, for the 3.8-4.2 GHz and 1800 MHz bands?</p>	<p>As stated in the consultation document, spectrum sharing is a key part of Ofcom’s strategy for spectrum management. The DSA commends Ofcom for applying what it is learning from the initial deployments of shared access licenses, the first series of ‘sandboxes’ it has established, and public comments, to fine tuning its shared access spectrum framework in the 3.8-4.2 GHz band.</p> <p>Shared access licenses in the 3.8-4.2 GHz (and other) spectrum bands offer the prospect for providing additional localized 5G capacity through private networks. Assuming CEPT harmonizes shared use of the 3.8-4.2 GHz band in Europe, an ecosystem will develop for low and medium power 5G base stations and create a virtuous cycle of infrastructure equipment produced at scale.</p> <p>DSA has provided comments in several of Ofcom’s shared access license consultations. With its recent actions and this consultation, Ofcom is looking to strengthen the overall economic benefits of its shared access framework by enabling a greater number of users to access the spectrum (e.g., assume synchronized transmissions, increasing building entry loss, creating an antenna library, user-led coordination) and new use cases (e.g., neutral host model), lessen regulatory friction by streamlining processes (e.g., fewer Medium Power licenses having to go through an exception process), all while still ensuring that licensees are protected from receiving harming interference.</p> <p>The DSA supports Ofcom’s proposal to set the EIRP and height limits for a medium power license in the 3.8-4.2 GHz band at 42 dBm EIRP and up to 10m height above ground level as its baseline, for areas outside of Greater London. Outside or rural areas, exceptions would still be required for medium power licenses with antenna heights above 10 meters. Over time, as holders of medium power licenses under the shared access framework deploy private networks in more densely</p>

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	<p>populated areas, Ofcom will have the opportunity to learn and further refine its rules.</p>
<p>Question 2: Do you have any comments on our proposed balancing measures:</p> <p>i) to continue to only grant Medium Power licences in the Greater London area (as defined in our mm Wave work) by exception, applying the ‘premises sterilisation’ test?</p> <p>ii) to apply a 100 MHz limit to the amount of spectrum a licensee can transmit at Medium Power in a particular urban area?</p> <p>iii) to apply a new price as part of this liberalisation, set at £160 per 10 MHz for Medium Power licences in urban areas?</p>	<p>The DSA’s experience is that regulators tend to be very cautious when it comes to spectrum sharing in high density areas. The DSA understands why regulators initially often take this position. It is to protect incumbents from receiving harmful interference. But it often feels to those parties seeking to share spectrum as overprotection.</p> <p>The DSA views Ofcom applying the ‘premises sterilisation test’ to all applicants seeking medium power licenses in the Greater London area as a conservative first step. We are encouraged, though, by Ofcom willingness to re-examine requirements and mitigations for shared spectrum use once equipment has been deployed, as demonstrated in its recent decisions in the 3.8-4.2 GHz band.</p> <p>Use cases for private networks are still evolving. Setting a 100 MHz limit to the amount of spectrum a licensee can transmit at Medium Power in urban areas supports Ofcom’s goal of enabling a greater number of users to access the spectrum. But urban areas are not homogenous. In some urban areas there may be some industrial parcels within, controlled by a single entity, where there could only be a single Medium Power licensee. Here too, DSA is confident that as Ofcom’s shared access framework becomes more widely adopted it will seek to make adjustments, as warranted.</p>
<p>Question 3: Do you agree with our proposal to remove the TRR in relation to Low Power outdoor base stations in 3.8-4.2 GHz?</p>	<p>The DSA believes outdoor neutral hosts is a potentially interesting use case for low power private networks. It could help to alleviate mobile network congestion during so called busy hours in more densely populated areas. To the extent that Ofcom’s proposal to remove the Terminal Registration Requirement (TRR) for low power outdoor base stations will facilitate the establishment of outdoor private networks and innovative use cases operating in the 3.8-4.2 GHz band, the DSA is supportive of such action.</p>

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<p>Question 4: In relation to our impact assessment, do you agree with our assessment of the potential impact of the further proposals we are making?</p>	<p>N/A</p>
<p>Question 5: In relation to our equality impact assessment, do you agree with our assessment of the potential impact of the further proposals we are making on specific groups of persons?</p>	<p>N/A</p>
<p>Question 6: In relation to our Welsh Language impact assessment, do you agree with our assessment of the potential impact of our further proposals on the Welsh language?</p> <p>Do you think our further proposals could be formulated or revised to ensure, or increase, positive effects, or reduce/ eliminate any negative effects, on opportunities to use the Welsh language and treating the Welsh language no less favourably than English?</p>	<p>N/A</p>
<p>Question 7: Do you have any further comments on our proposals?</p>	<p>The Dynamic Spectrum Alliance (DSA) is a global, cross-industry alliance focused on increasing dynamic access to unused radio frequencies. The membership spans multinational companies, small- and medium-sized enterprises, academic, research, and other organizations from around the world, all working to create innovative solutions that will increase the utilization of available spectrum to the benefit of consumers and businesses alike. DSA is the only global organization focused on promoting spectrum sharing innovation to get the most out of wireless resources.</p> <p>A full list of the DSA members is available on the DSA's website at www.dynamicspectrumalliance.org/members/.</p>