

## **Consultation response form**

## Your response

Question	Your response
Question 1: Do you have any com- ments on our proposal to make Me- dium Power licences (42 dBm EIRP, up to 10m height) commonly availa- ble in urban areas across most of the UK, for the 3.8-4.2 GHz and 1800 MHz bands?	Confidential? – N HPE supports Ofcom's proposal to make Medium Power licences allowing an EIRP of up to 42 dBm EIRP and an- tenna heights of up to 10m commonly available in urban areas across the UK for the 3.8-4.2 MHz band.
Question 2: Do you have any com- ments on our proposed balancing measures: 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? ii) to apply a 100 MHz limit to the amount of spectrum a licensee can transmit at Medium Power in a par- ticular urban area? iii) to apply a new price as part of this liberalisation, set at £160 per 10 MHz for Medium Power licences in urban areas?	Confidential? – N ad i) HPE acknowledges that the innovative spectrum sharing approach taken by Ofcom requires a "training period" to better understand the implications of allowing medium power networks to operate in the 3.8-4.2 GHz band. We trust that Ofcom will continue updating and improving its regulatory guidelines based on the findings from current and future deployments to enable an even more efficient use of spectrum. ad 2) HPE agrees with Ofcom's objective to enable a di- verse ecosystem of use cases and users and to prevent spectrum hoarding. However, there may be cases that in a particular urban area demand for spectrum is skewed, i.e., a licensee has a need for more than 100 MHz of spectrum but there is little demand for spectrum other- wise. Ofcom may want to consider granting exceptions to the 100 MHz rule.

Question 3: Do you agree with our proposal to remove the TRR in rela- tion to Low Power outdoor base sta- tions in 3.8-4.2 GHz?	Confidential? – N HPE supports removal of any unnecessary restrictions that would limit the business case for the use of the shared access spectrum. The proposal to remove the TRR in relation to Low Power outdoor base stations in 3.8-4.2 GHz would open up new applications, including possible expansion of the neutral host business case.
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?	Confidential? – N HPE broadly agrees with Ofcom's impact assessment; however, we are not in a position to estimate the impact of the proposed pricing regime on users' businesses cases and on investment, innovation, and competition in general.
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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 per- sons?	n/a
Question 6: In relation to our Welsh Language impact assessment, do you agree with our assessment of the po- tential impact of our further pro- posals on the Welsh language? Do you think our further proposals could be formulated or revised to en- sure, or increase, positive effects, or reduce/ eliminate any negative ef- fects, on opportunities to use the Welsh language and treating the Welsh language no less favourably than English?	n/a
Question 7: Do you have any further comments on our proposals?	n/a