

## Your response

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<p><b>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?</b></p>	<p>Confidential? – N</p> <p>UKWISPA (UK Wireless Internet Service Providers Association) is the trade body representing the interests of wireless internet service providers (WISPs) across the UK. It supports and advocates for WISPs and alternative wireless network operators (altnets), promoting the use of wireless technologies such as Fixed Wireless Access (FWA) to deliver broadband services, particularly in areas underserved by traditional fibre networks.</p> <p>FWA includes technologies which may be based on 802.11, 4G, and 5G chip sets (e.g. including novel 5G stand alone networks).</p> <p>UKWISPA works to ensure that its members have access to the spectrum, regulatory support, and technical resources needed to expand broadband coverage, especially in rural and remote regions. It also collaborates with policymakers, including Ofcom, to influence spectrum allocation and licensing policies, fostering innovation and competition in the UK broadband market. Through its efforts, UKWISPA helps drive digital inclusion by providing high-speed, reliable internet access to homes and businesses, regardless of location.</p> <p>4G and 5G mobile networks are well suited to transport corridors, providing essential connectivity for commuters and travellers. However, the market is now evolving with the rise of 5G standalone and other advanced wireless technologies, which enhance competition and deliver greater consumer benefits. It is essential that regulation evolves to support this innovation, enabling all players—whether mobile operators, incumbents, or new entrants—to compete on a level playing field. A unified regulatory approach, rather than a siloed one with different rules for various stakeholders, will ensure that these technologies can flourish and deliver significant consumer benefits, such as better connectivity, increased choice, and more innovative services.</p> <p>UKWISPA welcomes Ofcom's decision to make medium power licences (42 dBm EIRP, up to 10 metres in height) available in urban areas for the 3.8-4.2 GHz and 1800</p>

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	<p>MHz bands. This move significantly reduces the administrative burden by eliminating the need for "exceptions" in most urban settings, allowing for more efficient deployment of networks. We believe this will enhance the ability to deliver innovative services like Fixed Wireless Access (FWA) and 5G stand alone networks, especially in urban environments where spectrum is highly valuable.</p> <p>The improvements in spectrum supply through updated coordination rules—such as reducing separation distances and adjusting the building entry loss assumptions—are another positive step. This will allow for better sharing of spectrum, enabling more users to deploy their services without interference concerns. UKWISPA sees this as a major benefit for consumers, as it will allow providers to better plan and expand their networks in high-density areas, improving access to high-speed broadband.</p> <p>We also appreciate the introduction of a more dynamic pricing structure for medium power licences, which incentivises efficient spectrum use. By encouraging users to opt for low-power deployments where applicable, Ofcom is promoting responsible spectrum management. That said, the ability to access medium power licences for FWA and other innovative services will provide much-needed flexibility in urban deployments.</p> <p>Additionally, UKWISPA welcomes the removal of the Terminal Registration Requirement (TRR) for low-power outdoor base stations in the 3.8-4.2 GHz band. This change will facilitate the growth of neutral host and "campus-style" 5G networks by reducing unnecessary administrative burdens. It also opens up new business models, particularly for private network operators and those looking to expand coverage in urban environments.</p> <p>Overall, UKWISPA supports these changes, as they create a more flexible, user-friendly framework that aligns with the needs of FWA and novel 5G deployments. We believe these measures will foster innovation and deliver real benefits for consumers by ensuring the UK's wireless services remain competitive and future-ready.</p>

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<p><b>Question 2: Do you have any comments on our proposed balancing measures:</b></p> <p><b>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?</b></p> <p><b>ii) to apply a 100 MHz limit to the amount of spectrum a licensee can transmit at Medium Power in a particular urban area?</b></p> <p><b>iii) to apply a new price as part of this liberalisation, set at £160 per 10 MHz for Medium Power licences in urban areas?</b></p>	<p>Confidential? – N</p> <p>(i)</p> <p>UKWISPA understands Ofcom's rationale for continuing to grant Medium Power licences in Greater London by exception, applying the ‘premises sterilisation’ test. We recognise that the dense urban environment in London presents unique challenges in terms of spectrum demand, co-existence, and interference management. However, from the perspective of promoting Fixed Wireless Access (FWA) deployment and ensuring consumer benefits, we believe there is an opportunity to review this approach carefully.</p> <p>The ‘premises sterilisation’ test, while offering protection for existing services, could potentially limit the ability of FWA providers to offer competitive services in key urban areas where connectivity is needed. London, being a major economic and technological hub, would benefit from the wider availability of medium power FWA services, which could bridge the digital divide and offer high-speed broadband options in areas underserved by traditional fixed-line infrastructure.</p> <p>UKWISPA believes there is a balance to be struck between safeguarding spectrum for existing users and enabling innovation and competition. We would urge Ofcom to consider whether a more flexible approach to medium power licences in Greater London might be possible, such as allowing targeted deployments in specific areas where interference risk is lower or introducing additional conditions that allow for greater access while maintaining robust protections for incumbent users.</p> <p>Ultimately, any regulatory approach should ensure that FWA providers are able to meet consumer demand for high-quality, reliable broadband services in all areas, including Greater London. A balanced, flexible policy could better serve the dual goals of protecting spectrum integrity and fostering consumer benefits through innovative FWA deployments.</p> <p>(ii)</p> <p>UKWISPA acknowledges Ofcom's intention to apply a 100 MHz limit to the amount of spectrum a licensee can transmit at Medium Power in a particular urban area,</p>

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	<p>and we understand the need to ensure fair access to shared spectrum among multiple users. However, from the perspective of promoting Fixed Wireless Access (FWA) deployment to maximise consumer benefits, we believe this limit requires careful consideration.</p> <p>The 100 MHz cap may be sufficient for many use cases, but it could constrain the potential for FWA providers to deliver high-capacity services in densely populated urban areas where demand for broadband is growing. In particular, as more consumers and businesses require higher bandwidth and faster connectivity, FWA providers will need sufficient spectrum to deliver competitive, high-quality services. Limiting spectrum in urban areas may unintentionally create bottlenecks, hindering the rollout of robust FWA networks that can compete with traditional fixed-line services.</p> <p>UKWISPA encourages Ofcom to consider whether the 100 MHz limit should be flexible, particularly in areas where there is low spectrum congestion or where greater spectrum access could significantly enhance consumer benefits. This flexibility could help FWA providers scale their services to meet demand, ensuring urban consumers have access to reliable, high-speed broadband.</p> <p>In balancing the needs of different spectrum users, we believe it is essential to maintain a framework that encourages FWA innovation and growth, enabling providers to offer competitive services. A more flexible approach to the 100 MHz cap, perhaps allowing for case-by-case exceptions where justified by local demand, could help ensure that consumers in urban areas receive the full benefits of FWA deployment.</p> <p>(iii)</p> <p>UKWISPA acknowledges Ofcom's proposal to set the price for Medium Power licences in urban areas at £160 per 10 MHz as part of the liberalisation of spectrum access. While we understand the need to manage spectrum through pricing mechanisms, we have some concerns about how this pricing structure might impact Fixed Wireless Access (FWA) deployment and, ultimately, consumer benefits.</p>

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	<p>From an FWA perspective, particularly for smaller operators looking to deploy in urban areas, the proposed price could present a financial challenge. These operators often work with tighter margins compared to larger telecoms companies, and the cost of spectrum can significantly impact their ability to scale and deliver affordable services to consumers. If the price is too high, it may discourage new entrants or smaller players from investing in urban deployments, potentially limiting competition and innovation.</p> <p>UKWISPA believes that a more tiered or flexible pricing model could better serve the dual goals of encouraging FWA deployment and ensuring responsible spectrum use. For example, offering discounted rates for smaller bandwidth allocations or for operators committing to serve underserved urban areas could help strike a balance. This would enable FWA providers to bring affordable, high-speed broadband to more consumers, particularly in parts of urban areas where traditional connectivity options may be lacking.</p> <p>Ultimately, the pricing mechanism should incentivise responsible use of the spectrum while also fostering innovation and competition in the FWA market. Ensuring that FWA providers can afford to access sufficient spectrum will drive consumer benefits, particularly in terms of improved broadband availability and affordability in urban areas. We would encourage Ofcom to explore more flexible pricing models that take into account the diversity of operators and their ability to deliver benefits to consumers.</p>
<p><b>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?</b></p>	<p>Confidential? – N</p> <p>UKWISPA fully supports Ofcom's proposal to remove the Terminal Registration Requirement (TRR) for Low Power outdoor base stations in the 3.8-4.2 GHz band. We believe this step is essential to promoting greater flexibility and efficiency in the deployment of Fixed Wireless Access (FWA) and other innovative wireless services, which will ultimately deliver significant benefits for consumers.</p> <p>The removal of the TRR will reduce the administrative burden on operators, enabling faster and more flexible</p>

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	<p>network rollouts. This is particularly important for FWA providers seeking to expand their services in areas that are either underserved by traditional broadband or where rapid deployment is critical. By eliminating the need to register mobile terminals, providers can focus on delivering high-quality connectivity without the complexity and costs associated with maintaining these records.</p> <p>Additionally, this change aligns with the growing demand for more agile, neutral-host, and private network solutions, which often require greater operational flexibility. Removing the TRR allows for smoother integration of these network types, enabling providers to deliver a wider range of services to consumers and businesses.</p> <p>UKWISPA believes this proposal will contribute to increased competition and innovation in the wireless broadband market, benefiting consumers through improved access to affordable, high-speed connectivity. We welcome this move and see it as a positive step towards a more efficient and consumer-friendly spectrum management framework.</p>
<p><b>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?</b></p>	<p>Confidential? – N</p> <p>UKWISPA largely agrees with Ofcom's impact assessment regarding the further proposals. We recognise that Ofcom has taken a balanced approach in assessing both the benefits and potential risks of the changes, particularly in the context of spectrum sharing, competition, and innovation in the wireless broadband sector. However, there are a few areas where we would encourage further consideration, especially regarding the potential impact on Fixed Wireless Access (FWA) providers and the resulting consumer benefits.</p> <p><b>Positive Impacts on FWA Deployment</b></p> <p>The proposals to increase spectrum availability, liberalise rules around medium power usage in urban areas, and remove the Terminal Registration Requirement (TRR) are all welcomed as they support faster and more flexible FWA deployments. UKWISPA agrees that these changes will help drive innovation and competition, encouraging more operators to enter the market or expand their offerings. This will ultimately deliver better connectivity</p>

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	<p>options for consumers, particularly in underserved or densely populated urban areas where broadband availability can be limited.</p> <p><b>Consideration of Costs for Smaller Providers</b></p> <p>While we support the overall assessment, we would like to highlight that the cost implications, particularly the proposed pricing for medium power licences, could disproportionately affect smaller FWA providers. The £160 per 10 MHz fee, while justified for spectrum management, might limit the ability of smaller players to compete with larger telecoms companies in urban areas. This could reduce competition and slow the pace of broadband rollout, especially in areas that need it the most.</p> <p>We believe that Ofcom should consider the potential impact on smaller providers more closely, as it might unintentionally affect the diversity of market players and consumer choice. UKWISPA recommends that Ofcom monitor the effects of this pricing structure on smaller operators and adjust as needed to ensure a competitive and inclusive market.</p> <p><b>Managing Interference and Coordination</b></p> <p>The impact assessment rightly highlights the importance of managing interference, particularly in the 3.8-4.2 GHz band. UKWISPA agrees that the updated coordination measures, including synchronisation and building entry loss adjustments, should help mitigate interference risks while ensuring that more users can access spectrum. We believe this will benefit FWA providers by allowing for more deployments without the need for extensive administrative hurdles.</p> <p><b>Conclusion</b></p> <p>In conclusion, UKWISPA agrees with Ofcom's impact assessment overall and sees the proposals as a positive step for the sector. We support the view that these changes will enhance innovation, competition, and spectrum efficiency, resulting in better services for consumers. However, we urge Ofcom to remain mindful of the potential financial impact on smaller providers and to ensure that the framework remains flexible and inclusive. This will help maximise the consumer benefits of</p>

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	<p>the proposed changes and promote a competitive and dynamic market for FWA and other wireless services.</p>
<p><b>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?</b></p>	<p>Confidential? – N</p> <p>UKWISPA agrees with Ofcom's equality impact assessment regarding the further proposals, and we appreciate the thorough consideration given to ensuring that these changes do not disproportionately affect any specific groups of people. The proposals, particularly those aimed at increasing access to shared spectrum and facilitating more flexible network deployments, have the potential to deliver benefits across all communities.</p> <p>We are particularly supportive of the assessment that these changes will help improve access to broadband in areas that are underserved or have historically faced digital exclusion, including rural and low-income urban areas. Fixed Wireless Access (FWA) can play a crucial role in bridging the digital divide, providing high-speed connectivity to areas where traditional infrastructure may not be viable. The flexibility and increased availability of spectrum proposed by Ofcom should help ensure that more people, regardless of location or socioeconomic status, have access to reliable internet services.</p> <p>Moreover, we believe the removal of the Terminal Registration Requirement (TRR) for Low Power outdoor base stations will enhance the ability of network providers to deploy services in areas that need it most, including for public sector initiatives like education, health, and local community projects, all of which could benefit marginalised or specific groups.</p> <p>We support Ofcom's conclusion that no group will be unfairly disadvantaged by these proposals and that the changes have the potential to promote equality of access to digital services. We encourage Ofcom to continue monitoring the effects of these changes to ensure that they continue to foster inclusion and do not inadvertently create barriers for any particular group.</p>



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<p><b>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?</b></p> <p><b>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?</b></p>	<p>Confidential? – N</p> <p>UKWISPA agrees with Ofcom's assessment regarding the potential impact of the further proposals on the Welsh language. We believe that the proposals, particularly those designed to enhance access to spectrum and support the deployment of Fixed Wireless Access (FWA) in urban and rural areas, are unlikely to have any adverse effect on the Welsh language.</p> <p>In fact, we see opportunities for positive outcomes, especially in rural Welsh communities where broadband infrastructure can be limited. By promoting flexible spectrum access and the wider deployment of FWA, these proposals could help improve digital connectivity in Welsh-speaking regions. This improved connectivity could, in turn, support greater access to Welsh-language content and services online, benefiting both Welsh speakers and those working to preserve and promote the language.</p> <p>We support Ofcom's conclusion that the proposals do not present any negative implications for the Welsh language and may, in fact, contribute to broader digital inclusion across Wales, including for Welsh-speaking communities.</p>
<p><b>Question 7: Do you have any further comments on our proposals?</b></p>	<p>Confidential? – N</p> <p>Fixed Wireless Access (FWA) and 5G standalone networks offer some distinct advantages over traditional Fibre to the Premises (FTTP) full fibre services in certain market scenarios. These technologies can provide rapid deployment in areas where it may not be cost-effective or practical to lay fibre infrastructure, such as remote and rural locations. Additionally, FWA and 5G standalone networks can support highly flexible and mobile use cases, enabling connectivity in areas where fibre cannot reach or is difficult to install or maintain.</p> <p>Given these capabilities, access to spectrum becomes a critical enabler for delivering high-speed broadband and advanced connectivity solutions via FWA and 5G. Spectrum availability ensures that these technologies can flourish, providing alternatives and complementary services to fibre, while addressing the diverse connectivity</p>

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	<p>needs across urban and rural areas. Therefore, enabling broader access to spectrum is essential for promoting these innovative technologies and maximising consumer benefits.</p> <p>UKWISPA strongly supports Ofcom's proposals and believes they offer a significant opportunity to enhance consumer benefits by enabling modern Fixed Wireless Access (FWA) and 5G standalone deployments. These technologies are essential for delivering cost-efficient, high-speed broadband services, particularly in rural areas where traditional infrastructure is lacking or prohibitively expensive to deploy.</p> <p>UKWISPA recognises the growing interest in satellite-based services such as Starlink broadband and Starlink direct-to-device (D2D) solutions. However, it is important to note that the cost of these satellite services is typically materially higher than that of Fixed Wireless Access (FWA). FWA offers a more cost-efficient solution for delivering high-speed broadband, particularly in rural areas, where affordability is crucial. Additionally, while D2D solutions have potential for mobile connectivity, they cannot presently offer full broadband services, further emphasising the value of FWA and 5G standalone deployments in providing reliable and affordable broadband to consumers across the UK.</p> <p>The increased access to shared spectrum, along with the liberalisation of medium power licences in urban areas, will drive innovation and competition, benefiting consumers with better connectivity options. FWA and 5G standalone networks are well-suited to bridging the digital divide, especially in underserved rural communities, by offering scalable, reliable broadband without the delays and costs associated with fibre rollouts, especially in harder to reach areas.</p> <p>They may also be applicable for provisioning of wireless broadband services on trains (e.g. mm Wave FWA by train track side estate, enabling WiFi for train passengers).</p> <p>Furthermore, the removal of administrative burdens such as the Terminal Registration Requirement (TRR) and streamlined processes for medium power licensing will enable faster deployment, allowing providers to respond quickly to consumer demand. These proposals not only</p>

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	<p>support the future of connectivity in urban areas but also play a crucial role in ensuring that rural and remote regions are not left behind in the digital economy.</p> <p>We encourage Ofcom to maintain this momentum, ensuring that spectrum management continues to promote competition and inclusivity, ultimately leading to more affordable, high-quality broadband services for all consumers across the UK.</p>

