

Consultation response form

Your response

Question 1: Do you agree with our assessment of current road tolling use in the 5.8 GHz band in the UK? Is there other current and future planned use that we are not aware of?	We believe that the 5.8 GHz band should be made available for outdoor use of RLANs.
Question 2: Do you agree with our analysis of the options for managing sharing between BFWA and RTTT? Are there additional options which we have not considered which in your opinion would result in a better balance of benefits and risks?	N/A
Question 3: Do you agree with our proposal to remove the notch and allow BFWA use in the whole of the 5.8GHz band?	Yes, we agree to remove the notch
Question 4: Are there any other considerations that you believe need to be taken into account and that are not already covered in this consultation?	Yes (attached)

Wi-Fi Alliance® Response to UK Ofcom Consultation “Consultation on improving access to 5.8 GHz spectrum for broadband fixed wireless access”

Wi-Fi Alliance Introduction

Wi-Fi Alliance is a global, non-profit industry association of over 700 leading companies from dozens of countries devoted to connecting everyone and everything everywhere. With technology development, market building, and regulatory programs, Wi-Fi Alliance has enabled widespread adoption of Wi-Fi worldwide, certifying thousands of Wi-Fi products each year. The mission of Wi-Fi Alliance is to provide a highly effective collaboration forum for Wi-Fi matters, grow the Wi-Fi industry, lead industry growth with new technology specifications and programs, support industry-agreed standards, and deliver greater product connectivity through interoperability, testing, and certification.

Wi-Fi Alliance has participated in past efforts to expand the spectrum resources available for unlicensed operations, including opening up portions of the 5 GHz band for unlicensed devices.

Wi-Fi Alliance Comments

Recent research¹ confirms that between 500 MHz and 1.5 GHz of additional spectrum will be required to meet the surging demand for licence exempt Wi-Fi services in Europe by 2025.

Wi-Fi Alliance applauds UK Ofcom’s decision to allow licence exempt Wi-Fi use in the 5.8 GHz band.² This decision is a significant step towards addressing the growing need for Wi-Fi spectrum, but nonetheless, spectrum available for Wi-Fi operations outdoor at higher power remains significantly limited and constrained.

In this regard, Wi-Fi Alliance notes that it would be beneficial to consider extending Wi-Fi operations in the 5.8 GHz band consistent with Ofcom’s proposal for Broadband Fixed Wireless Access (BFWA) in the 5.8 GHz, possibly with additional regulatory restrictions such as radiated power limit (e.g., 4W EIRP), Dynamic Frequency Selection, Transmit-Power Control, directional antenna gain, etc. Wi-Fi Alliance further notes that the 5.8 GHz band is widely used for Wi-Fi outdoor deployments in many countries around the world.

The Wi-Fi Alliance notes the following w.r.t. UK radars in the band as stated in the May 2016 Ofcom consultation -

4.26 We believe the risk of interference to military radars in some parts of the 5 GHz band has reduced significantly in recent years because the MOD no longer deploys two particular systems designed to operate at 5725-5850 MHz. We are therefore reviewing the DFS requirements in this band in conjunction with the relevant UK stakeholders.

4.27 A decision to change the requirements could be taken at a UK level, depending on permitted EIRP levels. DFS is not required in the USA and many other territories in the 5725-5850 MHz band and Wi-Fi/RLAN stakeholders have told us the DFS use

¹ Wi-Fi Alliance, *Spectrum Needs Study, Final Report*, February 2017 [WFA Spectrum Needs Study](#)

² [Ofcom decision-wireless-telegraphy-exemption-regulations](#)

in this band can be controlled nation-by-nation in firmware without needing country specific hardware.

We understand that the two particular systems that were used by the MOD have declining use. We wondered if the MOD use of radars in the band could be confirmed by Ofcom.