

Ofcom

Riverside House
2a Southwark Bridge Road
London
SE1 9HA

Re: Improving spectrum access for Wi-Fi

The Freshwave Group ('Freshwave') welcomes the opportunity to respond to Ofcom's consultation 'Improving spectrum access for Wi-Fi' ('the Consultation').

At Freshwave we invest expertise and capital in ways that make digital infrastructure remarkably simple. Faster, less costly and in the right places. We're the network service provider bringing together mobile operators, public authorities and real estate providers to work together in new ways. Our managed sites include some of the biggest, most challenging wireless environments in the UK, including several central London Boroughs and Docklands. With 5000+ mast site locations, 2000+ buildings connected and 200+ outdoor networks supported we ensure everyone has network. Backed by Digital Colony, we also combine technical telecoms and commercial real estate know-how to create long-term market impact. Acquired by Digital Colony between August 2018 and June 2019, the Freshwave Group companies are: StrattoOpencell, iWireless Solutions and Spyder Facilities.

We support Ofcom's objectives, reviewing and amending regulations to reduce congestion and enable innovative wireless services.

We support proposals to make the lower 6 GHz band available for wireless services and agree that this would improve wireless service performance. We note Ofcom's emphasis on Wi-Fi services in the Consultation. In our view it is important that this spectrum is also available to mobile and other wireless technologies such as LTE-LAA, MulteFire and 5G NR-U. These can coexist with Wi-Fi in existing 5 GHz licence-exempt spectrum and have superior mobility and security characteristics, making them much more suitable than Wi-Fi for many use cases. We understand from the consultation details that the channel access and occupation rules for the new "Wi-Fi" spectrum are indeed the same as for the 5 GHz spectrum. We would like Ofcom's post-Consultation statement to confirm that the lower 6 GHz band spectrum will be available to other compatible wireless technologies, for the avoidance of doubt.

We fully support Ofcom's proposal to remove DFS requirements in the 5.8 GHz band. As Ofcom states, the current UK-specific DFS requirement prevents spectrum harmonisation and limits the choice of wireless equipment, resulting in under-utilisation of this band in the UK.

Responses to the specific Consultation questions are given below.

Question 1: Do you have any comments on our proposal to open access to the 5925-6425 MHz band for licence-exempt Wi-Fi use?

As stated above, we support enabling access to this spectrum, provided it is also available for other licence-exempt uses such as LTE-LAA, MulteFire and 5G NR-U.



FreshWave

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Question 2: Do you have any comments on our technical analysis of coexistence in the 5925-6425 MHz band?

No comments.

Question 3: Do you agree with our proposal to remove DFS requirements for indoor Wi-Fi up to 200mW from the 5725-5850 MHz band?

Yes.

Question 4: Do you have any comments on other options that may be available for Wi-Fi and RLANs within the 5 GHz band?

No comments.

Regards,

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Graham Payne

Chairman (Freshwave Group)