About Gamma and this Consultation Response

Gamma Telecom Holdings Limited ("Gamma") is a Public Electronic Communications Network ("PECN") that provides wholesale fixed and mobile telephony and data services, to some 1,200 channel partners. Two of these channel partners are wholly owned subsidiaries and represent themselves over 20% of our business. In all cases, our partners and subsidiaries sell almost exclusively to all sizes of businesses and not-for-profit entities throughout the UK and increasingly to various European Union member states. Gamma has a turnover c£329m per annum and is ultimately owned by Gamma Communications plc, a company listed on the Alternative Investment Market with a market capitalisation of circa one billion pounds.

This consultation response relates to Gamma and its subsidiaries. Any conflict between the implied position of Gamma in any UK Competitive Telecommunications Association (UKCTA), Internet Telephony Services Providers Association (ITSPA) or Federation of Communication Services (FCS) responses or that of any other association in which Gamma is involved, or implies Gamma is involved, is accidental and we consider that our views in this response should prevail.

Gamma trusts that this response addresses the questions posed by the Office of Communications ("Ofcom") and would welcome the opportunity to elaborate on any points in more detail if required. Please don't hesitate to contact [✂], for further detail in the first instance.

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?

The proposal will encourage adoption of the 802.11ax standard given that the UK will have commonality with the US market and, very likely, the EU market (subject to the CEPT studies noted in 4.12 & 4.13 concluding satisfactorily). This commonality will enable manufacturers to develop and manufacture 802.11ax devices at volume so reducing unit cost and therefore encouraging adoption. Taking a divergent approach for access to the 5925-6425 MHz band within the UK would, in our opinion, drive up cost and harm competitiveness.

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

The technical analysis appears sound and the conclusions which drive the proposal are logical. Whilst interference with Point to Point Fixed Links is possible the low number of such licences (375) coupled with the fact that the fixed link receiver would need to be in very close proximity to the RLAN indicates that interference is highly unlikely.

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?

Removing the DFS requirement for indoor WiFi at up to 200mW within this band is very definitely the correct approach. It makes no sense to require DFS for such use and will bring the UK market in line with the US, Canada and other markets. Such technical market alignment will increase the competitive

supply of devices in a similar way to as we observed noted in our response to Question 1. We agree with the constraint reasoning in 5.14 to 5.18.

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

We have no specific comments. We would recommend that, as a principle, the UK does not diverge from consensus in and between other major geographic markets.

In our opinion the 6GHz hand should be prioritised for higher bandwidth applications ergo the spectrum should be allocated in say 40MHz and not 20MHz blocks as is the case in the legacy WiFi standards. There is a chance that spectrum could be used inefficiently if Access Points in close proximity are not configured with due consideration to their neighbours. We appreciate much thought has been given to this point, it may be something OFCOM want to discuss with the manufacturers and perhaps reserve the 6GHx band for intelligent 802.11ax devices leaving legacy device standards in the 2.4 and 5GHz band.