

Consultation title	Improving spectrum access for Wi-Fi – spectrum use in the 5 and 6 GHz bands
Representing (delete as appropriate)	Organisation
Organisation name	Hitachi Rail

Your response

Question	Your response
<p>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?</p>	<p>Hitachi Rail is the contractor of the New Rolling Stock, Signalling and Control System, Control Room and Associated Equipment project for the Glasgow Subway under commitment from Strathclyde Partnership for Transport (SPT, passenger transport executive responsible for planning and coordinating regional transport, especially the public transport system, in the Strathclyde area of western Scotland). Hitachi Rail is extremely concerned about the proposal to open access to 5925-6425 MHz band for licence-exempt Wi-Fi use and it supports the UITP Spectrum User Group initiative in favour of prioritising for Urban Rail Communications Based Train Control (CBTC) systems in the 5915-5935MHz band (with adequate protection from Radio LANs in the 5935-5945MHz band).</p> <p>Hitachi Rail has designed the usage of the 5GHz band for the project of the Glasgow Subway. According to the UITP Spectrum User Group initiative, Hitachi Rail will be able to provide to SPT the benefit of having a protected system the same way Hitachi Rail delivered in the European projects where it is directly involved (e.g. Copenhagen, Thessaloniki, Milan, Bruxelles).</p> <p>Securing the environment is extremely important as long as the availability of a public service is concerned and even more so if the application running within the protected environment is safety related. CBTC must be</p>

	protected in order to avoid interference issues and the UITP Spectrum User Group initiative is aiming at it. Having the confirmation of the availability of the protected spectrum before the system deployment would allow SPT not to bear additional costs for a future system retrofitting.
<p>Question 2: Do you have any comments on our technical analysis of coexistence in the 5925-6425 MHz band?</p>	No
<p>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?</p>	No Comment
<p>Question 4: Do you have any comments on other options that may be available for Wi-Fi and RLANs within the 5 GHz band?</p>	No