

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

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>Huawei considers that it is important for there to be sufficient amounts of both licensed and licence exempt mid-band spectrum to satisfy the continuing growth in the demand for data.</p> <p>As such, we welcome the availability of the 5925-6425 MHz band for use by licence exempt WAS/RLAN, to the extent that it will complement the future availability of the 6425-7125 MHz band for deployment of licensed IMT networks.</p> <p>We note that Ofcom’s consultation exclusively refers to Wi-Fi. However, it should be emphasised that the technology neutral nature of the UK’s spectrum regulations means that the availability of the 5925-6425 MHz would apply to all license-exempt WAS/RLAN technologies, including Wi-Fi (Wi-Fi 6E) and 5G NR-U. We would therefore request that Ofcom confirms the technology neutrality of its proposals in any of its future communications relating to this band, as its exclusive reference to Wi-Fi has caused misunderstandings among stakeholders who are not familiar with the technology neutrality of the UK’s spectrum regulatory framework.</p> <p>With the proposed availability of 5925-6425 MHz in the UK, 5G NR-U will utilize channel bandwidths in multiples of 20 MHz – in addition to carrier aggregation – to deliver high data rates, while Wi-Fi 6E will utilize up to 6 additional 80 MHz channels or 3</p>

	<p>additional 160 MHz channels. We note that both technologies are designed to support applications which do not require guaranteed QoS (a consequence of their stochastic MAC protocols optimised for licence exempt operation) and in non-mobile scenarios.</p> <p>We emphasise that similarly high data rate services which require mobility, or where QoS guarantees are essential, can be delivered through the use of 5G NR networks (a consequence of their well-established mobility features and deterministic MAC protocols, respectively) in the 6425-7125 MHz band.</p>
<p>Question 2: Do you have any comments on our technical analysis of coexistence in the 5925-6425 MHz band?</p>	<p>With regards to the Fixed Service, we note that CEPT has performed certain studies, included in ECC Report 302. However, CEPT has concluded that additional studies are needed to fully understand the impact of licence exempt usage on the Fixed Service, and in addition, any mitigation measures which may be required. Huawei urges Ofcom to ensure the protection of the Fixed Service and therefore to consider all studies that have been performed and are to be performed by CEPT when specifying the licence exemption regulations for the 5925-6425 MHz band.</p>
<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>	<p>We note the difficulty for administrations to ensure the indoor use of licence exempt WAS/RLAN equipment where this is required. As such, we would welcome any proposals from Ofcom on how to effectively manage and control such indoor use in order to avoid harmful interference to the incumbents.</p>
<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>	<p>No comments.</p>