

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

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>Intelsat welcomes the Ofcom proposal to open access to the 5 925-6 425 MHz band for low power indoor and very low power outdoor license-exempt Wi-Fi use.</p> <p>Intelsat agrees with Ofcom that the European harmonized power limits and sharing framework are important for achieving economies of scale for the Wi-Fi equipment. In addition, Intelsat would like to emphasize that harmonization is vital for the protection of FSS space receivers in the 5 925-6 425 MHz band which – similarly than any FSS uplink protection – will require joint efforts at the European level.</p> <p>Intelsat therefore respectfully requests Ofcom to continue promoting the proposed approach described in this consultation in the international forums, especially in CEPT, in order to achieve a European harmonized framework that both protects incumbent usage in the band and allows Wi-Fi industry to access the band in a straightforward and timely manner with required economies of scale.</p> <p>Intelsat is of the opinion that the Ofcom proposed approach for introducing Wi-Fi in this band will provide all industries involved in the shared use of the band with the regulatory certainty required for continued investment and for consumers in the UK the balance with</p>

	<p>continued services and improved Wi-Fi connectivity in a timely and inexpensive manner.</p>
<p>Question 2: Do you have any comments on our technical analysis of coexistence in the 5925-6425 MHz band?</p>	<p>While the additional technical analysis performed by Ofcom has been regarding protection of Fixed Links, Intelsat would like to emphasize that the same conditions (to exclude 1 W use both indoor and outdoor) are required also for the protection of FSS uplinks. Therefore, Intelsat would like to once more commend Ofcom for their approach to introduce only low power indoor and very low power outdoor Wi-Fi use in this band, and emphasize that any sharing solutions (such as databases) which do not take into account aggregate interference to FSS uplink would not be sufficient to allow high power use in this frequency 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>Intelsat has no comments.</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>Intelsat has no comments.</p>