

Spectrum Policy and Analysis
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

20th March 2020

Dear Sir/Madam,

Improving spectrum access for Wi-Fi - spectrum use in the 5 and 6 GHz bands

We welcome Ofcom's consultation regarding changes of spectrum use to reflect current and growing needs on the basis that existing licensees are sufficiently protected or offered viable alternatives.

Regarding question 1 of the consultation (*Do you have any comments on our proposal to open access to the 5925- 6425 MHz band for licence-exempt Wi-Fi use?*) we offer the following response:

Tampnet is significant user of the lower 6 GHz bands to provide high capacity fixed links between offshore structures used by the energy sector to provide mission critical communications. In the North Sea we operate 75 high capacity microwave point-to-point links consuming 377 frequency high bandwidth channels many of which are in the UK sector. 43 % of our microwave network operates in the band 5,925 - 6,425 MHz with much of the remainder in the upper 6 GHz and 7.5 GHz bands.

Our main concern is that some studies such as those performed by CEPT show that Wi-Fi usage in the proposed bands can cause coexistence issues for fixed links particularly when in the beam of the antenna of the victim link.

Re-engineering any of our links to avoid potential interference is not only a very significant activity in terms of time and cost, but it can also be difficult to find viable channels in alternative bands delivering the same performance, as the number of channels available is already quite limited by interference between existing users. Furthermore, we note that there may be additional pressure on these alternatives as some of the spectrum is in scope of Agenda Item 1.2 of WRC-23.

We are concerned about any implementation of the proposed access that might lead to interference including undue interference from devices that do not respect outdoor power limits. We therefore urge Ofcom to anticipate these situations with suitable policies to control, monitor and enforce so that licensed users of fixed links may continue to enjoy their rights.

We have no other comments regarding the other questions.

Yours faithfully,

Cyprien de Cosson

Senior Radio Spectrum Engineer