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| Consultation title | Improving spectrum access for Wi-Fi – spectrum use in the 5 and 6 GHz bands |
| Representing (delete as appropriate) | Organisation |
| Organisation name | Transport for London / London Underground Limited |

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>Transport for London (TfL) and London Underground Limited (LUL) are supporting 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), although in London automated metro lines and Crossrail (central part) are using the 2.4GHz band. This is to get at least one secured band in case there are problems in using the 2.4GHz band or when there is a need to replace the signalling systems in the future. Indeed the 2.4 GHz band may face some interference problems for CBTC systems as they are not protected in this band. There would likely be considerable cost in future to the public sector should TfL / LUL be forced (due to interference issues) to transition from a signalling system commissioned on the 2.4 GHz band to the new band.</p> <p>Please note that the Urban Rail sector requires priority over 20MHz of a contiguous spectrum which covers from 5915 MHz to 5935 MHz according to the proposed revised Electronic Communications Committee (ECC) decision submitted to Public Consultation in 2019, which means that Urban Rail ITS applications have also to be protected from RLAN operating above 5935 MHz.</p> |

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| Question 2: Do you have any comments on our technical analysis of coexistence in the 5925-6425 MHz band? | No |
| 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? | No Comment |
| Question 4: Do you have any comments on other options that may be available for Wi-Fi and RLANs within the 5 GHz band? | No |