

Your response

Question	Your response
<p>Question 1: Do you agree with Ofcom's proposal to update the authorisation approach and technical criteria for SRD data networks in the 870 to 874.4 MHz band? If not, please provide your reasoning.</p>	<p>No comment</p>
<p>Question 2: Do you agree with Ofcom's proposals to authorise higher power use of 57 to 71 GHz by wideband data transmission systems via a light licensing regime? If not, please provide your reasoning.</p>	<p>Opening the 57-71 GHz band to equipment compliant with EU SRD Band 75b will trigger innovation and enable new services in the UK. In particular, Terragraph is a technology that operates on 60 GHz band delivering fiber-like speeds. In markets where fiber access to consumers is cost prohibitive and slow to deploy due to factors such as permitting, trenching etc., Terragraph can be a better alternative to provide fiber-like connectivity at a significantly lower cost. It's also much faster to deploy and can be deployed to market in a matter of weeks.</p> <p>Authorising higher power use of 57 to 71 GHz by wideband data transmission systems is an important step to reduce the digital divide in the UK.</p> <p>Limiting exposure to EMF is an important requirement for any network. Full compliance with government and international guidelines should be a prerequisite for any deployment.</p> <p>It is important for OFCOM to explicitly stress out in its authorisation regime that the light licencing is not related to spectrum efficiency/spectrum interference consideration but solely to EMF exposure consideration. This will ensure that international regulators understand this new regulation in the right context. It is important to maintain harmonisation of the regulatory conditions concerning channel access and interference mitigation in the band at international level to avoid risk of fragmentation of the device ecosystem.</p> <p>With this caveat, we support the light</p>

	<p>licencing regime proposed by OFCOM to promote compliance with EMF exposure guidelines.</p> <p>The main conditions proposed by OFCOM for the spectrum access licence seem to be reasonable and avoid placing an excessive burden on the operators.</p> <p>However, OFCOM’s proposal to adopt a one year notice period for Ofcom to revoke the licence for spectrum management reasons may not provide sufficient regulatory certainty to enable significant investment in the band. While this notice period may be appropriate for test equipment in EHF, it would not support mass-market internet access deployment in 57-71 GHz.</p> <p>Furthermore, the proposed Annex 7 does not seem to accurately implement OFCOM’s regulatory proposals. It is not clear whether a licence holder has to comply with both schedules 1 and 2 or just one of the schedules. In either case, the draft proposal would not work as schedule 1 and 2 are not compatible from a frequency standpoint (cannot both be respected at the same time) while schedule 2 does include neither reference to EMF exposure nor requirement to maintain a written records of the details relating to the Radio Equipment. We recommend OFCOM to develop a new licence specifically for the 57-71 GHz band.</p> <p>Finally, we recommend OFCOM to implement their proposal as quickly as possible. Products compliant with EU Band 75b are already commercially available. Providing regulatory clarity to operators as quickly as possible is very important to enable network deployment in 57-71 GHz and innovative services to UK citizen.</p>
<p>Question 3: Do you agree that the Proposed Regulations would correctly implement the policy decision made earlier this year on extending Wi-Fi to the 6 GHz band, the SRD Decision and, if agreed, the changes to SRD Data Networks in the 870 to 874.4 MHz band?</p>	<p>No comment</p>