

Your response

Question	Your response
Question 1: Do you agree with our proposals to add the 6425-7070 MHz band to the Shared Access framework?	<p>Confidential? N</p> <p>Federated Wireless commends Ofcom for its continued leadership in making much-needed spectrum available to meet the surging demand for broadband and next-generation wireless services. We further support Ofcom's efforts to make spectrum in the upper 6 GHz band available for Wi-Fi-based new services while ensuring that the present and future needs of both incumbent licensed and newly authorized users are met.</p> <p>However, rather than extending the Shared Access framework to this band, Federated Wireless recommends that Ofcom consider the use of database-enabled sharing technology, such as an automated frequency coordination ("AFC") system, to maximize flexibility and access opportunities for new devices, such as those based on the Wi-Fi family of standards.</p> <p>For example, the use of an AFC system would enable Ofcom to authorize higher transmit power levels (i.e., 1 W) and permit more flexible deployments (i.e., outdoor operations, closer device spacing, etc.) and open up additional use cases (e.g., industrial, logistics, hospitality). An AFC system with its scalable, automated architecture could assist Ofcom in achieving such key objectives as: 1) protecting incumbent operations by reflecting the current (and future) operating characteristics of incumbent 6 GHz bands users; and 2) maximizing spectrum access opportunities for new devices and use cases by leveraging the capabilities of the cloud to optimize development and deployment opportunities.</p>

Question 2: Do you have any comments on potential uses for this licence?

Confidential? – N

Federated Wireless strongly supports Ofcom's Shared Access license framework. Through our participation in the 5G Trial and Testbed program we are demonstrating how Shared Access licensing can support neutral hosting and spectrum sharing to provide connectivity to hard-to-reach and underserved areas. We have also developed an automation tool for the Shared Access licensing framework that, if implemented, would significantly streamline the process for obtaining information about shared spectrum availability as well as the acquisition a license.

That being said, Federated Wireless is concerned that the Shared Access license approach, as proposed for the upper 6 GHz band, will be cost-prohibitive and overly labour-intensive for traditionally license-exempt technologies, such as Wi-Fi. We anticipate that the additional layers of complexity associated with obtaining a Shared Access license, together with the operational restrictions proposed, will impede development and deployment of Wi-Fi systems in the band.

Federated Wireless notes the growing interest in use of the entire 6 GHz band for license-exempt operations, in particular those based on the Wi-Fi family of standards. Numerous regulatory authorities worldwide have already adopted rules for license-exempt devices and/or are in the process of considering their adoption. This growing interest bodes well for the development of a truly global market and associated economies of scale, which could quickly be brought to bear in the U.K.

To meet Ofcom's objectives of promoting sharing, localised use, and innovation, we encourage Ofcom to consider use of an AFC, rather than the Shared Access licensing framework, to enable Wi-Fi use of the upper 6 GHz band, specifically for standard power devices and devices operating outdoors. Were the amount of spectrum available for license-exempt operation change in the future, the AFC could be leveraged to make channel assignment adjustments quickly and on a

	<p>widespread basis without imposing the burdens of acquiring or revoking licenses on license-exempt users.</p>
<p>Question 3: Do you have any comments on our proposed licence conditions, licence fee or minimum separation distance?</p>	<p>Confidential? – N</p> <p>Federated Wireless has concerns that the proposed license conditions, including the license fee, are overly restrictive and may exert negative pressure on market development and adoption. As mentioned above, were an AFC implemented instead of a first-come, first-served manual license process, consumers and enterprises could both take advantage of the global economies of scale developing for Wi-Fi device operation across the entire 6 GHz band. Furthermore, with coordination managed by an AFC, higher transmit power levels, outdoor operations, and smaller separation distances could all be readily achievable.</p>
<p>Question 4: Do you have any comments on our technical analysis?</p>	<p>Confidential? – N</p> <p>No comment.</p>