

## Your response

Question	Your response
<p><b>Question 1: Do you agree with our proposals to add the 6425-7070 MHz band to the Shared Access framework?</b></p>	<p>None confidential.</p> <p>We agree that access to the specified band should be opened up, but we do not agree with the proposed approach.</p>
<p><b>Question 2: Do you have any comments on potential uses for this licence?</b></p>	<p>None confidential.</p> <p>We disagree with the use of licensing as a means of controlling access to the 6GHz spectrum because licensing will prevent the benefits of the additional spectrum from being universally available.</p>
<p><b>Question 3: Do you have any comments on our proposed licence conditions, licence fee or minimum separation distance?</b></p>	<p>None confidential.</p> <p>We consider the proposed minimum separation distance would hamper uptake for WiFi-6e Users in the extended 6GHz range on the basis that it does not seem to reflect the complexity of the world and this would disadvantage some Users.</p> <ol style="list-style-type: none"> <li>1. Consider a city centre, littered with distributed buildings from Universities, Coffee shops, Food outlets, and so on. If a prolific landowner with a great many distributed buildings were to be the initial successful applicant, the proposed 100m MSD would adversely impact tens or hundreds of neighbouring businesses, households, neighbouring Universities, NHS buildings (etc) by preventing them from adopting the new frequency range.</li> <li>2. The proposed approach does not make it clear how it would support nation-wide multisite organisations. If an organisation has 500 outlets across the UK, realistically how would those sites be tracked? How would the licensing process consider the impact of granting a license to such an organisation when it will impact so many other neighbouring networks by preventing them from accessing the full 6GHz spectrum?</li> </ol>

	<p>3. The proposed system does not seem to include measures to stop Applicants from using the license system vexatiously. Applicants could apply for a license and never use it, just to prevent neighbouring organisations from using it.</p> <p>Objections aside, we do appreciate the need for the spectrum to be controlled and we absolutely do not want the 6GHz band to experience the same congestion problems we see at 2.4GHz. ITGL would prefer to see Ofcom implement a solution that adopts technical constraints to control the frequency range rather than use licensing. Potential technical solutions to the challenge might include;</p> <p>Mandating the use of channelisation that is compatible with WiFi-6e's 20/40/80/160 MHz channels.</p> <p>Preventing the use of extremely wide channels, such as the 320MHz wide channels proposed by WiFi 7 (802.11be).</p> <p>Imposing further EIRP limitations to limit neighbours' impact upon each other.</p>
<p><b>Question 4: Do you have any comments on our technical analysis?</b></p>	<p>None confidential.</p> <p>(A5.4) The technical analysis seems to place significant emphasis on protecting existing 6GHz users and does not seem to reflect upon the benefits of allowing the population at large to access the upper 6GHz range.</p> <p>There is no discussion about the anticipated impact of allowing access to the upper 6GHz band in a none-licensed scenario.</p>