

Your response

Question	Your response
<p>Question 1: Do you agree with our proposals to add the 6425-7070 MHz band to the Shared Access framework?</p>	<p>Omnispace UK Ltd. (Omnispace) utilises the 6925-7075 MHz frequency band on a global basis for its NGSO satellite system feeder links in the space-to-Earth segment.</p> <p>Omnispace has three operational gateways using the UK’s ICO-P ITU filing for feeder links in the bands 5100-5250 MHz and 6925-7075 MHz. One additional gateway is being provisioned, and others are being considered.</p> <p>Omnispace agrees with Ofcom’s proposals to add the 6425-7070 MHz band to the Shared Access framework if it is used for indoor-only, low power, licensed use and if the technical conditions of operation protect the feeder links of NGSO satellite systems in a manner consistent with Article 5 of the Radio Regulations of the International Telecommunication Union (ITU) footnote 5.458B and the UKFAT 2017.</p>
<p>Question 2: Do you have any comments on potential uses for this licence?</p>	<p>Omnispace supports Ofcom’s proposal to make the band available for indoor-only, low power, technology-neutral use on a licensed basis.</p> <p>Omnispace does not support “standard power” (i.e., higher power devices) for outdoor use under a dynamic spectrum access system such as the automatic frequency coordination system adopted in the United States. In Omnispace’s view, it would be difficult to ensure that RLANs operating under such a framework would remain “low interference potential” especially when there is no reliable means of capping the aggregate emissions from the RLANs.</p>
<p>Question 3: Do you have any comments on our proposed licence conditions, licence fee or minimum separation distance?</p>	<p>Omnispace supports Ofcom’s proposal that this band be licensed primarily because it is utilised by existing services and it is important to track users of this band in the case of harmful interference.</p> <p>Omnispace also supports this band to be licensed for the reasons outlined in the consultation paper given that international preparations</p>

	<p>for the World Radiocommunication Conference 2023 (WRC-23) and separate work in CEPT related to this frequency band are ongoing and should be accommodated.</p>
<p>Question 4: Do you have any comments on our technical analysis?</p>	<p>Ofcom states in the consultation paper that it believes the assumptions and analysis presented in ECC Report 302 for the lower 6 GHz band can be applied to the sharing between FSS satellite receivers and RLANs in the upper 6 GHz band. Omnispace believes this is a reasonable assumption, and that RLANs are likely to be feasible with limitations on higher power outdoor use.</p> <p>Omnispace suggests that Ofcom condition the license that if FSS receivers suffer harmful interference in space, then RLANs must cease their operation.</p>