Consultation response form

Your response

Question	Your response
Question 1: Do you have any comments on Ofcom's proposed Plan of Work 2023/24?	*Confidential – N* *Yes. Please see our response to the Enabling Wireless Services in the Broader Economy section of Ofcom's proposed Plan of Work 2023/34.*
Enabling Wireless Services in the Wider Economy	The Dynamic Spectrum Alliance (DSA) appreciates the opportunity to provide comments on Ofcom's proposed plan of work for 2023/24. The DSA is a global, cross-industry, not for profit organization advocating for laws, regulations, and economic best practices that will lead to more efficient utilization of spectrum, fostering innovation and affordable connectivity for all. We advocate for policies that promote unlicensed and dynamic access to spectrum to unleash economic growth and innovation. Additionally, we advocate for a variety of technologies that allow spectrum sharing enhancing broadband access.[1] DSA's comments will focus on Sections 1.17, 2.25, and 2.29 of Ofcom's proposed plan of work for 2023/24. **Plan of work Section 1.17**. In its proposed plan of work, Ofcom indicated that it is seeking to understand "how the demand for wireless services will evolve," "how radio technologies will develop," and how to maximize "innovations that can unlock

[1] Our membership spans multinationals, small-and medium-sized enterprises, as well as academic, research and other organizations from around the world. A full list of DSA members is available on the DSA's website at www.dynamicspectrumalliance.org/members.

	long-term benefits for a wide range of spectrum users." Today, there is high demand for next-generation wireless connectivity for both consumer and enterprise networks. Spectrum sharing will be an important component to meet this demand, as will both licensed (including shared, local licensing) and license-exempt access options. **Plan of work Sections 2.25**. The DSA agrees with Ofcom's observation that "[s]pectrum is the vital element underpinning a broad range of wireless services and technologies that feature in our everyday lives and support businesses and public services." For example, without sufficient license-exempt spectrum to support the latest generations of Wi-Fi technologies, consumers will face a multitude of challenges with accessing vital services that are necessary for the 21st century. The DSA believes Ofcom has the opportunity to ensure sufficient license-exempt spectrum is available by extending its rules for the lower 6 GHz band to the upper 6 GHz band (6.425-7.125 MHz). As the DSA has noted in previous comments to Ofcom, the evolution of Wi-Fi 6E to Wi-Fi 7 will necessitate access to all 1200 MHz (5925-7125 MHz) of the 6 GHz band to support current and emerging innovative use cases. Wider channel bandwidths will increase spectrum efficiency and further improve latency, throughput, reliability, and quality of service. In acknowledgement of future capacity and performance requirements, countries in all three ITU regions, including the United States, Canada, Brazil, Saudi Arabia, and South Korea have already opened the entire 6 GHz band for license-exempt use. The DSA encourages Ofcom to do so as well and take advantage of the global economies of scale that are developing.

	Plan of work Section 2.29. Ofcom has identified spectrum sharing as a top priority in its 2023/24 proposed plan of work. This tool is gaining increased traction by regulatory authorities all over the world to manage their finite spectrum resources. We recommend Ofcom implement automated dynamic spectrum management systems as soon as possible to build upon the successful sharing access licensing framework it has already put in place, which will further improve operational flexibility for new services and maximize spectrum efficiency to achieve its stated goal in Section 1.18 of the proposed plan of work. Moreover, the DSA encourages Ofcom to leverage Automated Frequency Coordination (AFC) system technology to increase operational flexibility for license-exempt standard power access points and fixed client devices in the 6 GHz band that can be operated either indoors or outdoors, depending on the emissions mask. These license-exempt standard power devices will be essential to help factories manage emissions levels, power the latest innovations in precision surgeries at hospitals, and enable full educational campus wireless coverage for consumer and research capabilities. The United States, Canada, and the Kingdom of Saudi Arabia have approved standard power device operations and are in the process of authorizing AFC systems. As Ofcom is aware, the United States and Canada have received and are evaluating applications from multiple prospective AFC system operators, while Brazil has issued a consultation seeking input on its rules for standard power and AFC system operations. By joining these nations, the United Kingdom can benefit from a vibrant standard power device ecosystem and increasing economies of scale and critically, from the perspective of dynamic spectrum management, accelerate the development of UK-based AFC systems.

	We appreciate the opportunity to share our perspectives on how Ofcom can meet its objectives for the 2023/24 plan of work and leverage dynamic spectrum management systems and other spectrum sharing tools to increase access, spur competition, and foster innovation.