

## Consultation response form

### Your response

Question	Your response
<p><b>Question 1: Do you have any comments on Ofcom's proposed Plan of Work 2023/24?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>We commend Ofcom for a comprehensive plan of work for the year 2023/2024. Our response focuses on wireless and spectrum aspects of the plan of work, as those are the areas of direct relevance to our work and professional interests.</p> <p>We agree with <b>Section 1.9</b> that tech giants will play a larger role in mobile networks. Specifically, from our work, we see this already beginning in private 5G networks for use cases such as live broadcast and events where cloud-edge core networks and tier-2 radios fit the bill better than conventional deployment models. We also note that Microsoft, AWS and Google have already acquired GSMA SAS-SM accreditation required for eUICC subscription management. Moreover, big telco vendors such as Nokia and Ericsson have entered partnerships with cloud providers including AWS, Microsoft Azure and Google Cloud for cloud-native network function provisioning.</p> <p>We acknowledge and note Ofcom's intention to efficiently manage radio spectrum in <b>Section 1.11</b>, which for private 5G networks (n77 shared bands and others), has, we believe, significant potential for UK businesses and consumers. Our recent engagement with spectrum teams at Ofcom, and our work with the UK Spectrum Policy Forum as part of new DCMS projects, is aligned with spectrum efficiencies, which we interpret as more sharing.</p> <p>We note and acknowledge Ofcom's designation of "accelerating spectrum sharing" as a strategic priority for 2023/2024 in <b>Section 1.24</b> and would hope to engage and provide input to this via our R&amp;D work as well as engagements with SMEs, tiers1 and broadcasters in the UK and partnering with others from the EU.</p>

We further note and acknowledge the Spectrum Management Strategy and roadmap for spectrum innovation in **Section 2.29** and would hope to engage as a future “spectrum sandbox” within Glasgow and Scotland based projects. We have active work with industry partners including the use of the RFSoc technology (RF sampling at up to 10GHz rates) for spectrum monitoring and gathering real world data via our live RF Sampling tools and mapping to the Ofcom spectrum map. Our focus is not for co-existence or propagation modelling but for future self-aware AI radios, moving towards cognitive type radios supporting other technologies as appropriate in the (5-10 year) future. We also believe that self-licensing with automated secondary trading for ad-hoc use of spectrum would facilitate efficient use of spectrum in the near future.

We acknowledge the activity for increased international leadership on spectrum management in **Section 2.30**. Our interests on this are for shared spectrum, where we believe the early rollout of n77 gives the UK good leadership opportunity and to then innovate and engage internationally. Our teams’ recent engagements and work on this includes sharing n77 activities with partners, regulators and industry in Denmark, France, New Zealand, Ireland, Kenya, Singapore, Thailand, and Nigeria.

We applaud Ofcom’s intention of working with academia and industry to explore new ways for innovation and sharing, in specific geographies and specific bands. As part of some UK Govt supported industry/academic partnership projects, we also intend to move forward with this work in 2023, working with ‘sandbox’ licences for n77 and other bands and proposing new short-term spectrum sensing licensing approaches.