## Your response

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Question 1: Do you have any comments on Ofcom's proposed Work Plan for 2025/26?	Confidential? –No  Wi-Fi Alliance commends Ofcom for recognizing the critical importance of wireless connectivity as outlined in the <a href="the Plan of Work for 2025/26">the "Plan"</a> ) (pages 19-20). Wireless broadband is undeniably a cornerstone of the UK's digital economy, supporting innovation, productivity, and essential public services. And Wi-Fi Alliance concurs with Ofcom's tentative plans to investigate interservice sharing options in the upper 6 GHz to address UK's growing need for wireless connectivity (the Plan, Annex 2, page 42). Wi-Fi Alliance however, respectfully asks Ofcom to consider that a multiyear "exploration of options" effort without any substantive action will profoundly disadvantage critical 6 GHz Wi-Fi technology ecosystem, which is already proving indispensable for delivering high-capacity, low-latency connectivity to support innovation in sectors like healthcare, education, manufacturing, and smart cities. Unnecessarily prolonging regulatory uncertainty regarding the upper 6 GHz spectrum would constitute a missed opportunity to fully harness this valuable resource and deploy readily available Wi-Fi technology that fuels technological innovation and economic growth.
	Wi-Fi Alliance respectfully asks Ofcom to modify the Plan to prioritize timely and actionable outcomes on the upper 6 GHz band—a spectrum resource that is urgently needed by Wi-Fi technology to deliver next-generation connectivity to the UK consumers and enterprises.
	Call to Action:
	1. Unlock the 6 GHz Wi-Fi Potential: The growing convergence of mobile (cellular) and Wi-Fi within the wireless broadband infrastructure underscores the urgent need for a decision on the 6 GHz band. This convergence is premised on leveraging the complementary strengths of mobile (cellular) and Wi-Fi technologies to deliver seamless, high-performance connectivity, with:
	<ul> <li>mobile networks providing wide-area coverage for ro- bust outdoor mobility.</li> </ul>
	<ul> <li>Wi-Fi networks providing high-capacity, localized connectivity in environments such as homes, enterprises, and public venues.</li> </ul>
	But Wi-Fi Alliance asks Ofcom to consider that the upper 6 GHz spectrum is uniquely suited and central to the latest and future generations of Wi-Fi, such as Wi-Fi 7. There is no other frequency band with sufficient bandwidth to sustain

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	the high-performance demands of Wi-Fi, making access to the upper 6 GHz spectrum essential for its continued evolution and capability. Importantly, delaying the upper 6 GHz decision disproportionately disadvantages the rapidly advancing Wi-Fi ecosystem, favouring speculative and as-yet-undeveloped 6 GHz cellular technologies.
	A timely Ofcom decision to open the upper 6 GHz band for unlicensed use would send a strong signal of Ofcom's commitment to maximizing the benefits of this spectrum. Such a decision would not only support the vibrant Wi-Fi ecosystem but also ensure that the UK remains at the forefront of global digital innovation.
	<ul> <li>2. Foster Socioeconomic Benefits and Advance UK Competitiveness. The upper 6 GHz band has the potential to unleash transformative connectivity benefits. Ofcom's decision to enable advanced 6 GHz Wi-Fi would empower: <ul> <li>Business Innovation: High-throughput, low-latency wireless connectivity is essential for modern enterprises.</li> <li>Public Services: Enhanced Wi-Fi connectivity will improve healthcare delivery (e.g., telemedicine and remote diagnostics), education (e.g., digital classrooms), and smart city initiatives.</li> <li>Consumer Experience: Access to the upper 6 GHz band will enable advanced Wi-Fi connectivity in residential settings, particularly in multiunit housing.</li> <li>Conversely, failing to act risks leaving the UK behind global competitors, such as the United States and South Korea, which are already benefiting from robust Wi-Fi deployments in the 6 GHz band.</li> </ul> </li> </ul>
	3. <b>Respond to Urgency of Demand.</b> The exponential growth in data traffic—driven by cloud computing, video streaming, IoT devices, and AR/VR—is placing unprecedented demands on existing spectrum resources. Without Wi-Fi access to the upper 6 GHz band, the UK's wireless infrastructure will struggle to keep pace, creating bottlenecks for innovation and economic productivity.
	4. Align Spectrum Policy and Environmental Sustainability Priorities. Telecom networks consume significant energy resources and thereby have a substantial impact on sustainability. The Plan should account for the UK commitment to reducing greenhouse gas emissions. In this regard, Wi-Fi Alliance respectfully asks Ofcom to consider that by leveraging the upper 6 GHz band for Wi-Fi, the UK can reduce the carbon footprint of its telecommunications infrastructure, contributing to climate goals and promoting sustainable

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	technological development. The recent <u>Sustainability Benefits of 6 GHz Spectrum Policy</u> study offers clear evidence that empowering Wi-Fi with access to the upper-6 GHz band spectrum capacity results in a sizeable reduction in energy consumption and corresponding reduction in the CO <sub>2</sub> emissions.
	<b>Recommendations -</b> Wi-Fi Alliance urges Ofcom to incorporate the following actions into the Plan:
	<ul> <li>Initiate a Public Consultation in 2025 on the future use of the upper 6 GHz band, explicitly considering its designation for unlicensed use to support advanced wireless technologies.</li> <li>Establish a Clear Decision Timelines on the upper 6 GHz band that prioritizes regulatory certainty and provides industry with a roadmap for investment in this critical spectrum.</li> </ul>
	Conclusion In 2025/26 Ofcom has a unique opportunity to cement the UK's leadership in wireless broadband by taking decisive action on the upper 6 GHz band. By doing so, Ofcom will optimize spectrum use for maximum benefit and ensure that the UK remains at the forefront of the digital economy. Wi-Fi Alliance stands ready to support Ofcom in this process and would welcome the opportunity to engage further on this important matter.