



Response to Ofcom's Consultation Document on:

**Notice of proposal to make Wireless Telegraphy
Exemption Regulations 2017;
Consultation on Regulations and proposed
technical parameters**

(Issued by Ofcom on 9 March 2017)

**BT plc
11 April 2017**

Introduction

BT has long supported national and international work on enabling use of the 5 GHz band by licence exempt devices, and we welcome these latest proposals to now extend the available frequency range. The 5725 – 5850 MHz band provides a welcome opportunity to increase the number of available channels for Radio Local Area Network (RLAN) devices / Wi-Fi.

In this document we refer to “Wi-Fi”, but we do recognise that there are also other technologies such as LTE-LAA which could be appropriate for this band. In the spirit of technology neutrality, it is not our intention to favour or discriminate against any particular technology in the band, providing it can meet the appropriate regulations, and can also share the band in a co-operative manner with other technologies (i.e. it includes “polite protocols”).

Our responses to the consultation questions

Question 1: Do you have any comments on the drafting of the Proposed Regulations?

In July 2016 we supported Ofcom's proposal to consider the 5725 – 5850 MHz for Wi-Fi, and we still hold that view. Industry figures show that the use of the 5 GHz band for Wi-Fi is growing at a significant rate, and this is expected to continue for the foreseeable future. Recognising that 5725 – 5850 MHz is already enabled for Wi-Fi in some other parts of the world (most notably in the US), we believe that extending the existing licence exempt band is both sensible and logical, providing it would not cause unacceptable interference to the incumbent users (which we believe is the case). Therefore we support the drafting of these Proposed Regulations.

Whilst we acknowledge that the issuing of a VNS is the appropriate route for enabling devices to operate in this band in the UK, we do have a concern that identifying this band unilaterally within Europe could significantly constrain its use by Wi-Fi, particularly due to the variation in product compliance (with respect to EN 301 893). Therefore we strongly encourage Ofcom to promote consideration of this band for Wi-Fi within CEPT, in the hope that this band could be identified for Wi-Fi on a pan-European basis, in order to enable its inclusion in both the ECC Decision and the ETSI Harmonised Standard at some stage in the not too distant future.

Question 2: Do you have any comments on the proposed technical parameters?

We note that Ofcom has taken a conservative approach with regard to the technical parameters, and we understand the reasons for this. In general we support these technical parameters, although we are very aware that the need for DFS has in practice resulted in reduced use of the channels, due to excessive false triggering of the DFS. In our experience the DFS requirement and its practical implementation can represent a barrier to the effective use of the 5 GHz spectrum and it is important that this requirement is kept under review to ensure that it is essential, optimally specified and effective in achieving its intended objective.

It is particularly interesting that Ofcom acknowledge that they have a “caution approach to sharing with radars” (in §3.36), recognising that “the use of radars in 5.8 GHz might be fairly light in the UK and we will keep this requirement ... under review”. Given that use of this band is limited to 200mW EIRP and indoor operation, the potential for interference into radars is very much diminished, and

BT's response to Ofcom's Consultation on 5 GHz band

we would urge Ofcom to re-consider (now, or at the earliest opportunity) their proposal for requiring DFS. If the requirement for DFS could be removed, then it would greatly enhance the usefulness of this band.

END