



iWireless Solutions Ltd Response to Ofcom's
Consultation "Statement on improving spectrum access
for consumers in the 5 GHz band

and

Notice of proposal to make Wireless Telegraphy
Exemption Regulations 2017"

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iWireless Solutions Ltd welcomes the opportunity to respond to Ofcom’s consultation “Statement on improving spectrum access for consumers in the 5 GHz band and Notice of proposal to make Wireless Telegraphy Exemption Regulations 2017”.

iWireless Solutions Ltd (iWireless) is a leading wireless systems integrator. We provide wireless consultancy, audit, design, installation and maintenance services for Wi-Fi, Cellular and other wireless technologies. iWireless provides solutions in complex environments with high user densities such as stadia, airports and urban areas.

Many of our customers are heavily dependent on the 5 GHz band, mostly for Wi-Fi but also for broadband fixed wireless access (BFWA). Wi-Fi congestion is becoming an issue as demand increases, as well as interference from other Wi-Fi systems outside our customers’ demises. Licence exempt spectrum is a valuable but limited resource, and needs careful coordination where possible to maximise the benefit. iWireless is supportive of attempts by Ofcom to increase the amount of spectrum for Wi-Fi.

Answers to the specific questions in the consultation document are given below.

1. Q1: Do you have any comments on the drafting of the Proposed Regulations?

We agree with Ofcom’s assessment of increasing Wi-Fi demand for the foreseeable future, that the availability of more Wi-Fi spectrum would help mitigate Wi-Fi congestion, and that the 5.8GHz band is the most appropriate band to open up for Wi-Fi in the short term.

We note that there are over 10,000 registered BFWA terminals in this band. We believe Ofcom should allow public access to anonymised data on terminal locations so that users can make informed decisions on the suitability of this band for Wi-Fi and/or BFWA in specific locations.

Ofcom should continue to explore the medium and long term options listed in Section 2.1.

2. Q2: Do you have any comments on the proposed technical parameters?

We agree with Ofcom’s proposal for a low power limit and a ban on fixed outdoor usage, as this would minimise the risk of interference with BFWA and other Wi-Fi users.

We understand Ofcom’s proposal for DFS in this band, however DFS is disruptive to wide channels (40/80/160MHz) so we agree that Ofcom should keep this constraint under review. We believe Ofcom should carry out and publish research on DFS events in representative deployment scenarios, to help Wi-Fi system designers meet requirements for capacity etc.