

Wireless Broadband Alliance (WBA)

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

The Wireless Broadband Alliance (WBA) welcomes and applauds the efforts proposals to extend Wi-Fi access in the 5 GHz band to an additional 125 MHz (5725 to 5850, the '5.8GHz band').

At the same time, we encourage Ofcom to continue with its efforts on the Medium term ("Re-examining the technical requirements for Wi-Fi" and "Promoting Wi-Fi use under the existing primary mobile allocation in 5850 -5925 MHz"). Specifically with respect to the 5925-6425 MHz band, Ofcom should also consider enabling RLANs access, in support of the ECC WG FM to study the technical and regulatory feasibility of harmonized introduction of low power wireless access systems (including RLAN) in the band 5925-6425 MHz. In the Longer term ("Removing outdoor restrictions on Wi-Fi access to the 5150 – 5350 MHz range"), such as mentioned in the document.

Recent research by the Wi-Fi Alliance demonstrated the need for additional spectrum, with the growing number and Wi-Fi devices will exceed the capacity of spectrum currently available in the 5 GHz band by 2020 and might require between 500 MHz and 1 GHz of additional spectrum to support expected growth in Wi-Fi by 2020, or even between 1.3 Ghz and 1.8 GHz by 2025 if demands exceeds expected growth.

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

With respect to the proposed technical conditions: power limitation to 200 mW per channel, ban on fixed outdoor use, and normal WAS/RLAN channel access and occupation rules, we would like to provide the following comments and recommendations:

1. We would like to urge Ofcom not to preclude any (future) considerations on the usage of higher EIRP.
2. With respect to the proposed DFS requirements, we would like to draw out that it is our understanding that the exclusion proposed by Ofcom of fixed outdoor usage would cover point-point/point-multipoint and fixed access point to client communications and we also understand that mobile and nomadic use is not precluded.
3. In our opinion, the DFS requirement should be evaluated as the current technical conditions of 200 mW and the abovementioned ban on fixed outdoor usage, interference with radar systems would be very unlikely, and as mentioned in the document, the usage of radars in 5.8 GHz might be fairly light in the UK.
4. Ofcom should also be aware that multiple Wi-Fi industry organizations, including the WBA, have efforts underway to ascertain the impact of DFS requirements on the utilization of unlicensed spectrum. The WBA project in this area is evaluating utilization of channels with DFS requirements versus non-DFS channels. . It seeks to clarify the state of DFS channel utilization, and if underutilization is confirmed – identify causes and possible industry and/or regulatory remedies. The WBA will be pleased to share our findings with Ofcom when they are available.