CommScope

Additional comments:

Question 1: Do you have any additional information to provide to that presented in this Consultation that you believe Ofcom should consider? If so please provide clearly evidenced views. Are there any other issues that you believe Ofcom should have considered?:

CommScope believes that there are many innovative approaches in 80GHz equipment design and installation available today. The nature of the propagation at these frequencies together with the antenna characteristics means that it is possible to realise some very compact equipment designs that give rise to systems with a very low visual impact. However RF spectrum must be deployed as efficiently as possible to maximize the potential use of the 80 GHz band and allow for future as yet unknown network deployments. Backhaul solutions can be installed down to street level with equipment being mounted on building corners/sides and street furniture as opposed to traditional tower mounting without compromising on spectral efficiency. This potentially creates extremely dense networks and therefore it is essential that all antenna radiation pattern envelopes are circular symmetric in order to avoid issues of off-axis interference.

CommScope believes that market forces should determine the efficient use of spectrum and would propose a model whereby links using better performing antennas, for example ETSI Class 4 compliant models, incur a lower charge for spectrum that one using Class 3 compliant antennas. This model encourages both innovation and spectrum conservation.

Question 2: a)Do you agree with our proposals to offer a mixed solution that allows stakeholders to choose between the currently available self coordinated authorisation approach and a new Ofcom coordinated approach for the band? b) Do you agree with the segmented band plan with the split of 2 x 2 GHz and 2 x 2.5 GHz for Ofcom coordinated and self coordinated approaches respectively? c) Is the guard band size of 250 MHz considered appropriate between the two approaches? :

a) CommScope believes that having an Ofcom coordinated approach to this band will greatly increase confidence in using this band. Our discussions with potential users have shown highlighted reservations regarding the use of light licensed/licence exempt spectrum as they believe there is insufficient protection from interference. This potential for interference results in users considering using other frequency bands or non radio technologies.

b) CommScope believes that the larger portion should be the Ofcom coordinated portion as we believe the growth application for this band will be small cell backhaul for which quality of service is paramount in most cases.

c) CommScope has no comment to make on this aspect of the consultation

Question 3: a) For the Ofcom coordinated part of the band, do you agree with the proposal to make available channels of 500 MHz and 250 MHz (with

smaller channels being made available when the standards are completed) and to make these channels available in up to 1 GHz bandwidth in the first instance? b) Is there a requirement for channel sizes greater than 500 MHz in the coordinated block? Please submit evidence to support your view.:

a) CommScope agrees with the proposal to use 250MHz and 500MHz channels and to allow multiple contiguous channels to be concatenated up to 1GHz.

b) CommScope believes that providing concatenation of contiguous channels (as in 3(a) above) is allowed than channel sizes of greater than 500MHz is not required.

Question 4: a) Are there any aspects of the current self coordinated licensing and link registration process that could benefit from improvements? Please provide specific information and reasons for how your suggestions would improve the process. b) Should Ofcom consider mandating the CEPT channel plan, ECC/REC/(05)07 for the self coordinated block? Explain clearly the reasons to support your view. c) Are the technical parameters shown on the register sufficient to enable self coordination? Should Ofcom consider presenting additional parameters on the register? If so, which parameters and why?:

a) CommScope has no comment to make on this aspect of the consultation

b) CommScope believes that adopting the CEPT channel plan is desirable as this helps with equipment design by providing a common basis across the CEPT region, even more so, as the CEPT plan is now incorporated in the ITU-R Recommendation F.2006. Maintaining the current situation will lead to difficulties in coordination between systems, especially as in some areas demand may see backhaul applications being allocated in this portion of the band as well.

c) CommScope has no comment to make on this aspect of the consultation