

Your response

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<p>Question 1: Do you have any comments on our proposal to make Medium Power licences (42 dBm EIRP, up to 10m height) commonly available in urban areas across most of the UK, for the 3.8-4.2 GHz and 1800 MHz bands?</p>	<p>Confidential? – N</p> <p>Please note that our responses to all questions relate to the 3.8-4.2 GHz (n77) band.</p> <p>We support Ofcom’s proposal to make Medium Power (MP) licences available in most urban areas. However we think that this proposal should apply to <u>all</u> urban areas including London. We note Ofcom’s updated estimates of sterilised areas in the n77 band published in May. These show the impact of MP deployments in various urban areas is predicted to be 1 to 3 orders of magnitude less than indicated in the November consultation. Our own predictions show that signals attenuate quickly with range when the base station height is less than that of the surrounding buildings. Low Power (LP) EIRPs are therefore likely to be too low for viable deployments where coverage area is important. On the other hand the high path losses in urban areas allow greater reuse of the spectrum. We believe use of MP powers in London would enable more use cases and economic benefit with little sterilising effect. We note also the low number of n77 licences in the City of London currently (5 LP SALs within 2.9 km²), indicating very low spectrum utilisation.</p>
<p>Question 2: Do you have any comments on our proposed balancing measures:</p> <p>i) to continue to only grant Medium Power licences in the Greater London area (as defined in our mm Wave work) by exception, applying the ‘premises sterilisation’ test?</p> <p>ii) to apply a 100 MHz limit to the amount of spectrum a licensee can transmit at Medium Power in a particular urban area?</p> <p>iii) to apply a new price as part of this liberalisation, set at £160 per</p>	<p>Confidential? – N</p> <p>i) As stated in answer to Question 1, we don’t believe this balancing measure is required, whilst it could reduce the viability of some types of outdoor deployments. Nevertheless the premises sterilisation test seems like a straightforward, transparent and sensible test for the exceptions process.</p> <p>ii) Yes we agree this will help mitigate the risk of any one organisation preventing spectrum access for others.</p> <p>iii) We are concerned that the proposed price increase may deter some use cases and innovation. We believe there are more effective ways of incentivising efficient spectrum usage, such as reducing the cost of LP licences, increasing the MP licence fees gradually with EIRP,</p>

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<p>10 MHz for Medium Power licences in urban areas?</p>	<p>and/or taking account of predicted numbers of sterilised premises.</p>
<p>Question 3: Do you agree with our proposal to remove the TRR in relation to Low Power outdoor base stations in 3.8-4.2 GHz?</p>	<p>Confidential? – N</p> <p>Yes we welcome this change. However we note Ofcom is proposing to remove TRR for LP licences only. We believe the modest 3dB uplift in n77 LP EIRP is too little to make outdoor neutral host (NH) viable. We'd therefore like TRR removed for MP base stations. We understand Ofcom's concerns that public mobile usage could impede other innovative uses. However this could be mitigated, for example, by confining non-TRR use to a specific sub-band, and/or setting a lower sterilised premises threshold. In any case we believe there's enough spectrum and potential reuse in this band to remove TRR for MP outdoor deployments.</p>
<p>Question 4: In relation to our impact assessment, do you agree with our assessment of the potential impact of the further proposals we are making?</p>	<p>Confidential? – N</p> <p>We agree that regulatory changes are needed to maximise the innovation and economic benefit from the band, including a more flexible and less cautious coordination approach. Nevertheless we believe Ofcom's further proposals are relatively modest, particularly in the light of the sterilised premises correction which Ofcom published in May.</p> <p>We are disappointed that Ofcom's pricing will not take account of clustering of sites. The decision seems to be based on urban scenarios, however pricing is a barrier to deployment of private 5G in rural campus environments.</p>
<p>Question 5: In relation to our equality impact assessment, do you agree with our assessment of the potential impact of the further proposals we are making on specific groups of persons?</p>	<p>Confidential? – N</p> <p>No comment.</p>
<p>Question 6: In relation to our Welsh Language impact assessment, do you</p>	<p>Confidential? – N</p> <p>No comment.</p>

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<p>agree with our assessment of the potential impact of our further proposals on the Welsh language?</p> <p>Do you think our further proposals could be formulated or revised to ensure, or increase, positive effects, or reduce/ eliminate any negative effects, on opportunities to use the Welsh language and treating the Welsh language no less favourably than English?</p>	
<p>Question 7: Do you have any further comments on our proposals?</p>	<p>Confidential? – N</p> <p>We welcome the greater transparency for the coordination process with clearer tests applied. However we are disappointed that the exceptions process will not be flexible enough e.g. to consider exceeding MP EIRP limits in deep rural areas where spectrum demand is minimal.</p> <p>Ofcom’s coordination process, including the exceptions process, are heavily reliant on predictions of the interference effect of a requested deployment on existing licensees, and on premises which might want licences in the future. It is therefore important that these predictions are as accurate as possible within the constraints of Ofcom’s resources and decision timescales. We point to a current DSIT-funded Sandbox project which aims to improve n77 interference predictions in urban areas.</p>