

Your response

Question	Your response
<p>Question 1: Do you have any comments on our proposals to gather additional antenna parameters, and would you prefer Ofcom to specify a small number of antenna pattern ‘envelopes’ or for users to provide details of the specific antenna parameters in use for Ofcom to assess? Please provide reasons for your views.</p>	<p>DECT Forum recognises that having more sophisticated coordination processes, including applying antenna parameters, does have the potential to increase the number of Shared Access assignments by not unduly sterilising spectrum. This approach maximises the benefit of spectrum access to the greatest number of users and therefore is efficient management of the band.</p> <p>DECT Forum is neutral on the approach.</p>
<p>Question 2: Do you have comments on the suggested approach to enable user-led coordination in certain circumstances?</p>	<p>No comment.</p>
<p>Question 3: Do you have any comments on our proposal to increase the power level of our Low Power product by 3dBm in the 3.8-4.2 GHz band?</p>	<p>DECT Forum has no strong view on this. However, to note, DECT NR+ (DECT-2020 NR) can operate within the existing Low Power EIRP limit, and therefore for this technology there is no requirement for a power increase.</p>
<p>Question 4 Do you have any comments on our proposal to remove the requirement for licensees holding a Low Power 3.8-4.2 GHz licence to keep a record of the address at which mobile terminals connected to an indoor base station will be used?</p>	<p>No comment.</p>
<p>Question 5: Do you agree with our proposals to assume synchronisation between users, and coordinate base station to terminal instead of base station to base station in the 3.8-4.2GHz band? If no, please explain how other measures could increase sharing of the band.</p>	<p>DECT Forum agrees with the proposal to alter the coordination approach to one that is less conservative and enhances spectrum sharing.</p> <p>We welcome Ofcom’s statement that it will not mandate synchronisation (in the 3.8 to 4.2 GHz band) as this is the only option to ensure a technology and application neutral regime in the band.</p> <p>We note that Ofcom suggests that it may impose some form of synchronisation to mitigate interference between users (see paragraph 4.19). Ofcom’s position on</p>

	<p>synchronisation as the only approach to mitigate interference stems from its original assumption that the only technology option in this band would be based on 3GPP standardised equipment. However, different technologies have different approaches for mitigating interference.</p> <p>For example, the DECT NR+ standard supports advanced features enabling autonomous, time-accurate interference avoidance schemes over the air between DECT NR+ devices belonging to another network to minimise interference. DECT NR+ can also detect and adapt to interference from other systems sharing the same spectrum or adjacent spectrum with the DECT NR+ device.</p> <p>These interference mitigation techniques provide greater flexibility for users' requirements than an unsophisticated synchronisation approach.</p> <p>DECT NR+ uses a different frame structure to 3GPP, and therefore these two technologies cannot be synchronised. Also, it is possible that other current and future innovative technologies could look to operate in this band which also cannot synchronise.</p> <p>Given that different technologies may not be able to synchronise, and there are alternative approaches to mitigate interference, we are of the view that the statement in 4.19 risks favouring one technology (and one interference mitigation technique) over any other and undermines technology neutrality, stifles innovation and could limit competition and choice of technology for users.</p>
<p>Question 6. Please indicate whether you support our preferred option of coordination at -88 dBm/20 MHz (based on I/N of + 3dB, at 1.5m) or a more conservative alternative of -91 dBm/20 MHz (based on I/N of 0dB at 3m), with reasons for your view.</p>	<p>DECT Forum supports coordination based on the protection threshold of -88 dBm/20 MHz (based on I/N of + 3dB, at 1.5m). We recognise that the 3.8-4.2 GHz band is made available on a shared basis and therefore see no justification for having very conservative protection criteria which unnecessarily limits the potential for sharing.</p>
<p>Question 7: Do you agree with our proposals for an increase in BEL in 3.8-4.2GHz? If no, are</p>	<p>No comment.</p>

<p>there alternatives which you consider could better achieve similar results?</p>	
<p>Question 8: Do you agree with our proposal that adjacent band protection for Shared Access users is in future limited to considering only the first 5 MHz above and below UK Broadband assignments?</p>	<p>No comment.</p>
<p>Question 9: Do you agree with our assessment that, in circumstances where localised shortages of spectrum have occurred, pricing can be used to influence requested spectrum amounts?</p>	<p>Yes, DECT Forum agrees that pricing can be used to ensure that users are incentivised to only license what they need, particularly for larger bandwidths.</p>
<p>Question 10: Do you agree that we should take measures to reflect the impact of bandwidth, power levels and urban/rural location in our pricing approach for the 3.8-4.2 GHz band? Do you think there are other factors we should be taking into account?</p>	<p>Yes, DECT Forum agrees with the position set out by Ofcom.</p>
<p>Question 11: How do you consider the illustrative prices would impact your spectrum requirements and future deployment plans in the 3.8-4.2 GHz band? Please provide evidence in support of your view.</p>	<p>DECT Forum has no strong view on this at the current time. DECT NR+ can operate with large bandwidths, but initial deployments in this band are expected to be with bandwidths less than 10 MHz.</p>
<p>Question 12: Do you have any comments on our proposals to clarify the circumstances in which exceptions are available, the tests we will apply, and how this supports user flexibility outside our overarching rules?</p>	<p>No comment</p>
<p>Question 13: Do you agree with our overall approach based around refining our existing coordination framework for Shared Access, whilst monitoring future opportunities for more user led and outcomes led coordination where evidence suggests it would be of benefit?</p>	<p>DECT Forum broadly supports the proposed approach set out by Ofcom in this consultation. We are of the view that the changes in coordination parameters are proportionate and will allow for greater use of the 3.8 to 4.2 GHz band.</p> <p>However, we still hold concerns over the technical conditions within the licence and the suggestion that Ofcom may mandate synchronisation between networks as this presumes one technology standard. We propose that Ofcom should adapt its approach and thinking in relation to this band to be genuinely technology neutral, flexible and allow for innovation, rather than have the current approach which risks narrowing the choice for users.</p>

Question 14: Do you agree with our assessment of the potential impact on specific groups of persons?	No comment
Question 15: Do you agree with our assessment of the potential impact of our proposal on the Welsh language? Do you think our proposal 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?	No comment
Question 16: Do you have any other comments on the proposals set out in this document?	No comment

Please complete this form in full and return to sharedaccessresponses@ofcom.org.uk.