# Your response

| Question | Your response |
|---|---|
| **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.** | |
| **Question 2: Do you have comments on the suggested approach to enable user-led coordination in certain circumstances?** | <ul><li>Advanced commercial planning tools can account for the unique circumstances of each on-the-ground deployment, enabling them to assess local interference risks better. We support Ofcom's proposal to establish a new process where an applicant can gather the agreement of all potentially impacted licensees in a local area and ask for an 'override' to requests rejected by Ofcom's coordination tool. This is a significant way forward and should enable unnecessary restrictions in place due to the limitations of the planning tools to be lifted in appropriate circumstances.</li><li>We also support the proposal from CellNex; Ofcom should consider approving a group of 'certified providers' who can undertake coordination and planning activities on behalf of users who do not have access to the necessary planning tools.</li><li>We agree with Ofcom to ask stakeholders to provide additional information on their planned deployment to improve the chances of their application's approval and overall user experience.</li><li>We agree with Ofcom that the updated maps showing the availability in</li></ul> |

the 3.8-4.2 GHz band will enable applicants to make more informed decisions in their applications related to the preferred frequency range. Based on the view of local spectrum availability, applicants can assess their business case and request the Bandwidths and power levels more suited for their use cases. Higher granularity will also allow applicants to finetune the parameters to minimise interference to the existing users while deploying the transmitters to ensure their service areas are served well. It will also enable the applicants to coordinate with the other users when necessary. This will increase their chances of a successful application, thus reducing the workload on Ofcom and the wait time. This will also minimise the number of applications being rejected due to the lack of spectrum available.

**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?**

- We support Ofcom's proposal to allow higher operating powers for their equipment i.e. existing limit rise from 24 dBm to 27 dBm for bandwidths up to 20 MHz, and 21 dBm per 5 MHz for larger bandwidths. This will reduce the amount of equipment needed to deploy and improve coverage and additional capacity. This power increase would allow more users to do more things more efficiently in both urban and rural areas.

- Advanced planning tools can estimate if the higher power deployments will increase the worst-case sterilisation area of an individual licensee, hence allowing them to fine-tune parameters to minimise interference to the neighbouring users while maximising the benefits. We agree this will typically have little to no impact on spectrum availability once the updated terrain and clutter maps are implemented.

| | |
|---|---|
| **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? | |
| **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. | • We agree with Ofcom's proposal to implement a more flexible and less cautious approach to coordination. This includes not imposing a mandatory frame structure for the 3.8-4.2 GHz band.. This will enable licensees to choose the frame structure desirable for their use case. |
| **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. | |
| **Question 7:** Do you agree with our proposals for an increase in BEL in 3.8-4.2GHz? If no, are there alternatives which you consider could better achieve similar results? | |
| **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? | |
| **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? | |
| **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? | • ✂ |
| **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.** | |
| **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?** | • ✂ |
| **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?** | |
| **Question 14: Do you agree with our assessment of the potential impact on specific groups of persons?** | |
| **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?** | |
| **Question 16: Do you have any other comments on the proposals set out in this document?** | |

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