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.	We are open to providing Ofcom with additional antenna details, and open to both options. A small number of antenna patterns would help simplify this step and help with applications.
Question 2: Do you have comments on the suggested approach to enable user-led coordination in certain circumstances?	We are fully happy with this approach, especially considering we at Quickline have done this last year.
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?	This is a good change, a higher power in dense rural areas will allow users to serve hard to reach places in a cost-effective way.
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?	This can be a good change, the less admin the better is always a bonus.
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.	
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	We are happy with this change.

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?	No, it shouldn't price people out of the market, this limits the reach of deployments, to combat this, make more spectrum available instead by moving out of the n77 band or by using dynamic spectrum allocation.
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?	No, this should not be priced at a premium for rural areas due to the already high cost for deployments. Especially in our case at Quickline, we are designed to provide connectivity to rural communities. Connecting customers in rural areas is already at a high cost, with fibre being too pricy, we rely on spectrum, especially this band, to provide internet to these communities. This is a punishment, and as the largest stakeholder in this band, we are the most affected, and assuming our old licences costs will be changed, our costs have just doubled for nothing in return. If you want to increase the costs in urban areas, that's more arguable but for us, this is a bad idea and primarily affects us.
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.	This could change our ability to plan sites. We normally must reserve spectrum in order to guarantee sites can go ahead.
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?	We welcome more user led coordination.
Question 14: Do you agree with our assessment of the potential impact on specific groups of persons?	N/A
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	N/A

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.