making communications work for everyone

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.	Confidential? – N We appreciate the proposal to gather more information on antenna characteristics to support more efficient spectrum sharing. For directional antennas in particular, this makes it possible to estimate the interference scenario more accurately and realistically. To have a kind of library containing a small number of antenna patterns 'envelopes', makes it easier for the user to handle the parameters. In addition, the number of parameter sets is limited to a manageable number which reduces complexity in the coordination. Perhaps it makes sense to add these antenna pattern 'envelopes' to the SEAMCAT antenna library to make them available for future coexistence studies.
Question 2: Do you have comments on the suggested approach to enable user-led coordination in certain circumstances?	We welcome this approach because it is in line with our current activities at ETSI TC RRS, where we contribute to draft a new Technical Specification on "Dynamic Spectrum Allocation Service (DSAS); System requirements" (TS 104 011).
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 offers the possibility to use higher Modulation and Coding Schemes (MCSs) which leads to a more efficient use of spectrum.
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 is a useful proposal as it reduces unnecessary effort in setting up and deploying temporary local private networks.
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.	No, we don't agree with this proposal. Regarding private networks, the reasons are the following: • private networks based on different technologies will have different RF frame structures and therefore can't be synchronized with each other • even if the same RF frame structure is supported, the applications may

	require an individual UL/DL scheme to meet their QoS requirements • in nomadic and/or mobile applications it is unpredictable how the worst case would look like (BS into BS, BS into terminal, terminal into BS, or terminal into terminal) Therefore, it makes no sense to differentiate between terminal and base station as both have a very similar transmission characteristic
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.	As most of our receiver antennas in professional applications are mounted at 3m height and our users require undisturbed data at the transmission sink, we prefer a more conservative coordination at -91dBm/20MHz.
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?	Yes, this 2dB increase makes sense.
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?	We agree.
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?	Pricing is an adequate means of influencing spectrum usage.
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?	Yes, we agree. For temporary networks Ofcom should at least take into account the following factors: - operation time of the network - network reaction time on changes in the RF environment - synchronicity ability - maximum level of co-channel interference power
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.	We reiterate that retention of a pro rata option for licensees to access the band on a short-term basis is crucial for PMSE users. For some PMSE use cases, spectrum is required in a location for only a day or two. If Ofcom's longer-term intention is towards greater automation of the licensing process, we encourage it to also consider a pro rata license

	fee based on days or weeks. We believe such a future change would further incentivise innovative low power use cases and further reduce unnecessary spectrum sterilisation.
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?	We don't see the necessity to support exceptions for Medium Power licenses in urban areas in 3.8 – 4.2GHz as the focus in this band should be to enable spectrum sharing for private local networks.
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 appreciate Ofcom's approach of regularly reviewing its coordination framework and, if necessary, adapting it according to the needs and benefits of the user needs and future possibilities. In this respect, however, it is important that the adaptation not only benefits one user group but is equally beneficial for all users.
Question 14: Do you agree with our assessment of the potential impact on specific groups of persons?	Yes.
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?	We have no opinion on this.
Question 16: Do you have any other comments on the proposals set out in this document?	As mentioned earlier, the focus of the sharing framework for the 3.8 – 4.2GHz band should be on the application for private local networks with low power licenses.

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