

# Expanding spectrum access for fixed links in the 32 GHz band

Proposal to make additional spectrum available in the 32 GHz band for fixed links use

BT's response to Ofcom's consultation document issued on 1 August 2024

Issue: 1.0

13 September 2024

**BT Group**

## Executive summary

1. BT agrees with Ofcom's proposal to bring the blocks of 32 GHz band spectrum formerly licensed to MLL back into Ofcom's management and for it to be made available for fixed links use. This is likely to be the best option to achieve optimal and efficient use of this spectrum.
2. As the licensee of the adjacent sub-band, BT is concerned to ensure that its current and future use of the 32 GHz band will not be adversely impacted by the new spectrum management arrangements. That is to say BT would continue to use its own 32 GHz block allocation in accordance with the terms of the 32 GHz Spectrum Access licence that it holds and the rights and obligations specified within the licence.
3. BT understands that the precise details of the channelling arrangements and the coordination calculations to be applied by Ofcom in its management of the new fixed links assignments are not yet decided. We do not at this stage have any concerns to raise in this regard, particularly if an internal guard band is included in the Ofcom managed block and interference into BT's block is limited to levels similar to those specified in the Spectrum Access licence previously held by MLL.
4. BT will engage with Ofcom on its detailed spectrum management arrangements once these are decided and clarified, including discussion of any adjacent band coordination requirements should these be needed. With appropriate guard bands we are hopeful that adjacent band coordination would be unnecessary.

# 1 Introduction

BT welcomes this opportunity to comment on Ofcom's proposals<sup>1</sup> for future management of the blocks of 32GHz spectrum formerly licenced to MLL.

As the adjacent band licensee BT has particular interest in Ofcom's plans for how the spectrum will be used and managed.

Our responses to the consultation questions are provided below. More details of BT's use of the band are provided in the confidential Annex 1.

## 2 Response to consultation questions

***Question 1: Do you agree with our proposal to make this spectrum available for fixed links? Are there other potential users of these frequencies which we have not identified?***

Yes, given: (a) the limitations of sharing with other services to which the band is allocated; (b) the existing use of the rest of the band since the 32 GHz spectrum access licences were awarded and the availability of such equipment; and (c) possible new demand for fixed links as a result of Ofcom's decisions on the 26 GHz and 40 GHz bands; BT agrees with Ofcom's proposal to make this spectrum available for fixed links.

***Question 2: Do you agree with our proposal to make this spectrum available on an Ofcom-managed basis?***

Yes, we agree that this is an appropriate way forward. If there was demand for a new national block allocation for fixed links in this approximate frequency range it would probably have been possible to secure that on a commercial basis by spectrum trading of this or other suitable spectrum.

---

<sup>1</sup> <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-2-6-weeks/186191-expanding-spectrum-access-for-fixed-links-in-the-32-ghz-band/associated-documents/32-ghz-access-condoc/?v=373620>

**Question 3: Do you agree that 28 and 32 GHz spectrum is broadly substitutable from a fixed links perspective? If not, please explain why this is the case and provide evidence to support your views. In particular we would be interested to understand any differences between the 28 and 32 GHz bands which could make them more or less suitable for fixed links migrating from the 26 or 40 GHz bands.**

Yes, we agree that the 28 GHz and 32 GHz bands are broadly substitutable from a fixed links perspective.

**Question 4: Do you agree with our provisional proposal to make 28 MHz channels and one or more 56 MHz channels available for new fixed link assignments? If not, please explain the reasons for your view and set out any preferred alternative approach.**

Yes, we agree with Ofcom's proposal.

**Question 5: Do you have any additional concerns or comments regarding the proposals in this consultation document?**

BT will be interested in the channel arrangements that Ofcom settles on and the limits on in-block and out of block EIRP that will be applied for new fixed links authorised in the blocks of spectrum that it will manage.

BT utilises its block of spectrum in accordance with the rights and obligations set out in its licence and to date, given internal guard bands, has not experienced any interference problems and the licence does not require specific coordination arrangements with adjacent operators.

BT will engage with Ofcom on its detailed spectrum management arrangements once these are decided and clarified, including consideration of any adjacent band coordination requirements should these prove to be required. With appropriate guard bands we are hopeful that adjacent band coordination would be unnecessary.

We provided further information on BT's use of the band in Annex 1.

# Annex 1

**BT's current utilisation of its 32GHz spectrum access licence**

{

✂ Redacted

}



**13 September 2024**

**Find out more at [bt.com](https://www.bt.com)**




**Offices worldwide**



© British Telecommunications plc 2024

Any services described in this publication are subject to availability and may be modified from time to time. Services and equipment are provided subject to British Telecommunications plc's respective standard conditions of contract. Nothing in this publication forms any part of any contract.



Registered office: 1 Braham Street, London E1 8EE

Registered in England No. 1800000



**BT Group**

