

making communications work for everyone

Consultation title	Improving spectrum access for Wi-Fi – spectrum use in the 5 and 6 GHz bands
Representing (delete as appropriate)	Organisation
Organisation name	Facebook, Inc.

## Your response

Question	Your response
Question 1: Do you have any comments on our proposal to open access to the 5925-6425 MHz band for licence-exempt Wi-Fi use?	Facebook's mission is to give people the power to build community and bring the world closer together. And connecting people is a critical first step in executing this mission. Wi-Fi is an important part of connecting people at home and at work to broadband. As noted by Ofcom, as consumers access faster broadband speeds, "they are expecting higher capacity, faster speeds and greater reliability from their Wi-Fi." (1.2).
	By opening up the 5925-6425 MHz band for license-exempt Wi-Fi use, Ofcom will not only relieve congestion in existing Wi-Fi bands, but also create the foundation for next generation Wi-Fi standards, like Wi-Fi 6. Wi-Fi 6 is designed to be deployed over wider channels to support gigabit connectivity, lower latency, improved coverage and power efficiency. Furthermore, with lower latency, next generation Wi-Fi opens up opportunities for new VR/AR use cases.
	Additionally, we agree with Ofcom that people in the UK may be able to benefit from device availability and economies of scale for new, innovative technologies if this band is opened up both internationally and in the UK for similar purposes. (4.17) For this reason, Ofcom should consider opening up the upper portion of the 6 GHz band (6425-7125 MHz) for license-exempt use as the U.S. is currently considering.

Question 2: Do you have any comments on our technical analysis of coexistence in the 5925- 6425 MHz band?	We agree with Ofcom's proposal to apply a maximum mean EIRP of 250 mW for indoor use cases and a maximum mean EIRP of 25 mW for outdoor use cases with maximum mean EIRP density of 10mW/MHz in any 1 MHz band. These power levels will support a variety of use cases, including new innovative VR/AR use cases. We agree with Ofcom technical analysis building on CEPT studies that these power levels do not create interference to incumbents.
Question 3: Do you agree with our proposal to remove DFS requirements for indoor Wi-Fi up to 200mW from the 5725-5850 MHz band?	Yes. Removing DFS requirements from the 5725-5850 MHz band will allow for a greater variety of Wi-Fi based technologies, including VR/AR use cases, to better utilize this spectrum.
Question 4: Do you have any comments on other options that may be available for Wi-Fi and RLANs within the 5 GHz band?	No comments.