

## Your response

Question	Your response
<p><b>Question 1:</b> Do you have any comments on Ofcom's proposed Work Plan for 2025/26?</p>	<p>Confidential? – N</p> <p>The Dynamic Spectrum Alliance (DSA)<sup>1</sup> respectfully submits these comments in response to Ofcom's proposed Plan of Work 2025/26.</p> <p>The Dynamic Spectrum Alliance (DSA) commends Ofcom for its proactive approach in enabling wireless in the UK economy, addressing evolving needs of sectors, including mobile broadband. By ensuring sufficient spectrum availability to support the anticipated growth in consumer wireless services, as well as meeting the specialized needs of industrial users, Ofcom is laying the foundation for a connected and innovative future. We applaud Ofcom's commitment to promoting efficient spectrum utilization through forward-thinking decisions on spectrum sharing and coexistence frameworks.</p> <p>The DSA firmly believes that embracing additional spectrum access options—enabled by advanced spectrum management tools such as dynamic shared access systems—will drive competition, foster innovation, and accelerate the deployment of next-generation wireless networks and services. To achieve these goals, we encourage telecommunications regulators globally to adopt a balanced spectrum allocation strategy that includes licensed, license-exempt, and lightly licensed options. This approach will help prevent artificial scarcity, reduce broadband access costs, and ensure that both licensed and license-exempt spectrum bands play complementary roles in delivering advanced wireless services.</p>

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<sup>1</sup> The DSA is a global, cross-industry, not for profit organization advocating for laws, regulations, and economic best practices that will lead to more efficient utilization of spectrum, fostering innovation and affordable connectivity for all. Our membership spans multinationals, small-and medium-sized enterprises, as well as academic, research and other organizations from around the world all working to create innovative solutions that will benefit consumers and businesses alike by making spectrum abundant through dynamic spectrum sharing. A full list of DSA members is available on the DSA's website at <https://www.dynamicspectrumalliance.org/members>.

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	<p><b>1. Accelerate Access to the 6 GHz Band for Wi-Fi Growth</b>  Ofcom’s focus on enabling wireless connectivity aligns with the DSA’s aim for immediate authorization of license-exempt use across the entire 6 GHz band. The DSA advocates for immediate action to enable license-exempt use of the upper 6 GHz band, particularly for Low Power Indoor (LPI) and Very Low Power (VLP) operations. By doing so, Ofcom can unlock the potential of advanced Wi-Fi technologies like Wi-Fi 6E and Wi-Fi 7, which are critical for addressing the increasing demands for wide-bandwidth (160 MHz and 320 MHz), low-latency connectivity. Wi-Fi 6E and Wi-Fi 7 technologies, which thrive on the availability of wider channels, are essential for high-capacity applications in homes, businesses, and public spaces. Immediate authorization for LPI and VLP device operations in the upper 6 GHz band will reduce regulatory uncertainties and catalyse the deployment of advanced wireless networks. By ensuring technical coexistence, Ofcom can meet immediate connectivity goals and bolster stakeholder confidence.</p> <p>The DSA also welcomes Ofcom’s stated intention to consider additional uses for the lower 6 GHz band. Swift authorization of outdoor operation of Standard Power Wi-Fi in combination with Automated Frequency Coordination (AFC) would enable numerous new enterprise use cases.</p> <p><b>2. Support Dynamic Spectrum Sharing for Innovation</b>  The DSA strongly supports Ofcom’s emphasis on modernizing spectrum frameworks to enhance efficiency and flexibility. Dynamic spectrum sharing mechanisms allow multiple users to coexist and optimize spectrum resources. Such measures are vital for addressing increasing demand across sectors and supporting future connectivity needs.</p> <p><b>3. Foster Connectivity for Underserved Areas Using Wi-Fi</b>  Wi-Fi is a cost-effective and scalable solution to provide last-mile connectivity in underserved and rural regions. Ofcom’s commitment to supporting high-quality networks in challenging areas can be strengthened by expanding license-exempt spectrum access and community-based Wi-Fi deployments. These initiatives align with the DSA’s goals of fostering digital inclusion and reducing the connectivity gap.</p>

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	<p><b>4. Promote Wi-Fi Ecosystem Growth</b></p> <p>Ofcom’s leadership in international spectrum discussions is critical for ensuring the UK’s alignment with global Wi-Fi standards and equipment ecosystems. Harmonized policies across jurisdictions enable economies of scale, ensuring affordability and seamless connectivity for consumers and businesses. To support the growth of Wi-Fi technologies, Ofcom should align with market trends and ecosystem readiness by enabling licensed exempt access across the 6 GHz band. This can empower industries, SMEs, and consumers, enhancing the UK's position as a leader in wireless innovation and connectivity.</p> <p><b>5. Integrate Sustainability Goals in Spectrum Policy</b></p> <p>The DSA emphasizes the role of energy-efficient technologies, including the combination of Fibre and Wi-Fi, in achieving sustainability objectives. Ofcom’s work on advancing wireless technologies should include policies that encourage green practices, such as deploying low-power devices and reducing the environmental footprint of wireless networks.</p> <p><b>6. Enhance Stakeholder Engagement for Wi-Fi Expansion</b></p> <p>Ofcom’s Plan of Work highlights the importance of collaboration. Engaging with industry leaders, including the DSA, and incorporating their input into regulatory frameworks will ensure that policies remain aligned with technological advancements and market needs.</p>

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