

## 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>HPE commends Ofcom for its stated objective to enable wireless in the UK economy and for acknowledging the growing importance of radio spectrum for supporting the demand for a variety of services, enabling innovation and aiding economic growth.</p> <p>HPE concurs with Ofcom's view that providing UK consumers with access to high quality full-fibre and gigabit-capable networks is essential for empowering the digital society.</p> <p>At the same time, we would like to emphasize the need of UK businesses and public institutions for reliable, secure, flexible, affordable, and energy-efficient gigabit connectivity. This connectivity should be provided, wherever and whenever possible, through fibre and suitable complementary local wireless technologies.</p> <p>For wireless connectivity, both consumers and enterprises are heavily relying on Wi-Fi; for specific enterprise use cases, private 5G (P5G) networks are becoming increasingly popular.</p> <p>To enable enterprises to operate efficiently and/or develop new innovative devices, services and applications, it is of vital importance that adequate amounts of spectrum are made available for both Wi-Fi and P5G. For Wi-Fi, the 6 GHz band (5925-7125 MHz) is the only suitable spectrum left that can satisfy the growing performance requirements of enterprises and consumers by leveraging the technical capabilities of Wi-Fi 6E, Wi-Fi 7, Wi-Fi 8, and beyond.</p> <p>For these reasons, HPE appreciates Ofcom's proactive and pragmatic approach to making the lower and upper 6 GHz bands available for additional licence-exempt services.</p> <p>CEPT recently finished its work on ECC Report 364 which defines the conditions under which WAS/RLAN can coexist with incumbents operating in the upper 6 GHz band.</p> <p>Ofcom now has the opportunity to swiftly make the upper 6 GHz band available for Wi-Fi use.</p>

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	<p>While we acknowledge that there are considerations within Ofcom and CEPT to split the upper 6 GHz band between licence-exempt/Wi-Fi and licensed/IMT, we have to stress that many enterprise use cases, specifically those characterized by high user densities, require a large number on non-overlapping channels which only the full 6 GHz band (5925-7125 MHz) can provide. HPE is of the opinion that no credible use case justifying the allocation of the upper 6 GHz band, or parts thereof to IMT/5G/6G has been presented.</p> <p>Confidential? – Y</p> <p>[REDACTED]</p> <p>Confidential? – N</p> <p>Following requests from our UK customer base, HPE recommends Ofcom initiates updates of the current 6 GHz licence-exempt regulations, in particular the authorization of Low Power 6 GHz Wi-Fi use in stadiums that are not fully enclosed, the authorization of Standard Power Wi-Fi operating under control of an Automated Frequency Coordination (AFC) system, and the authorization of 6 GHz Wi-Fi Access Points with connectorized antennas.</p> <p>More than 90% of wireless data traffic originates or terminates indoors, with most of it being transferred over indoor local networks, in particular Wi-Fi. In the interest of using the available spectrum most efficiently, indoor coverage should be provided by indoor local networks while outdoor coverage should be provided by outdoor local or wide-area networks. Therefore, HPE encourages Ofcom to develop regulations that will not only enable but preferably mandate seamless handover between outdoor mobile/IMT and indoor networks. Industry has</p>

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	<p>already developed solutions such as Passpoint<sup>1</sup> for this purpose.</p> <p>Confidential? – Y</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Confidential? – N</p> <p>Finally, HPE would like to express its appreciation for Ofcom’s stated intention to maintain or expand its technical capabilities, to continue engaging with spectrum users, international counterparts, and industry, and to continue leading and influencing international discussions on spectrum access. Ofcom’s technical expertise and pragmatism will be urgently needed in international regulatory bodies such as CEPT.</p>

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<sup>1</sup> <https://www.wi-fi.org/discover-wi-fi/passpoint>