Your response

Question	Your response
Question 1: What interest do you have in deploying outdoor or standard power Wi-Fi or other licence exempt RLANs in the Lower 6 GHz band? Please provide details of the types of expected deployments.	We are an independent organisation that works closely with mobile network operators and Wi-Fi service providers that provide high-density public Wi-Fi services in large-scale outdoor venues with a stadium bowl. The current regulatory constraints on the outdoor use of the Lower 6 GHz band result in an interference-limited environment. As digital services are deployed and the take rate of visitors onto the deployed networks increases, so does the ability to deliver reliable, high-quality connectivity to the growing number of guest devices on the network in challenging environments. The availability of lower 6 GHz band for outdoor Wi-Fi or mobile would expand the available spectrum, reduce interference and enhance overall network performance. This improvement is not only a technical necessity but also a strategic imperative for some businesses that rely heavily on technologies. As we evolve our digital engagement offerings—such as interactive fan experiences, mobile ticketing, and real-time content delivery—reliable, high-capacity wireless connectivity becomes critical to delivering these services seamlessly. Enabling outdoor use of the 6 GHz band would directly support ongoing transformation towards a more digitally connected venue experience.
Question 2: Are you interested in providing or developing AFC databases for use in the Lower 6 GHz band in the UK?	Yes. Real Wireless has extensive experience developing reference databases for Ofcom that can be used to benchmark rules and algorithms defined by Ofcom, ensuring that potential database providers correctly implement those rules. Specifically, Real Wireless created a reference database that allows Ofcom to compare the outcomes of various TV White Space Database providers. Insights gained from developing such databases could be valuable to Ofcom and other database developers.
Question 3: Do you have any views on the operational considerations of setting up and running AFC databases?	Yes. Operational trials are crucial for optimising technology in high-density environments, where many 1,000s of users simultaneously join the Wi-Fi estate made up of many

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	100 of Access Points (APs) within a single venue. We have experience conducting large-scale trials in challenging environments.
Question 4: Do you have any views on how we should manage the approval process for AFC databases and, in particular, whether we should rely on parts of the FCC process rather than requiring the whole process to be re-run in the UK?	No. We support trials and are willing to participate early to ensure the approval process considers the high-density environments in which we closely work.
Question 5: Please provide any other comments on our proposals for extending access to standard power Wi-Fi and outdoor use, including the overall approach, any details on technical parameters and the running of the AFC databases in this band.	We recognise the importance of increasing spectrum availability to ensure reliable, high-performance connectivity. Therefore, we would welcome the opportunity to participate in early trials and the potential fast-tracking of standard power access to the lower 6 GHz band for outdoor use in large venue environments. We are open to collaborating with Ofcom and other stakeholders involved in the development and implementation of Automated Frequency Control (AFC) systems and technical frameworks. Our operational experience and deployment scale would provide valuable insights to support a robust and secure rollout of standard power Wi-Fi services in this band.
Question 6: Do you have any comments on our proposal to use a "phased" approach, or on the alternative to wait for European harmonisation?	We welcome the early availability of the 6 GHz band for both technologies. However, we believe that high-density venues such as stadiums often fall into a definitional gap between indoor and outdoor classifications. Specifically, many outdoor seating areas are partially covered and feature professionally installed, enterprise-grade Wi-Fi infrastructure which is often co-located with dedicated mobile coverage solutions. While technically classified as outdoor, these environments share key characteristics with indoor deployments and would benefit from access to the 6 GHz band under the initial rollout phase. We therefore propose that such partially roofed, high-density venues be considered for inclusion in Phase 1. Enabling early use of the 6 GHz band in these scenarios

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	would support improved service quality for users and could provide valuable insights for Ofcom through controlled, professionally managed trial deployments.
Question 7: Do you have any comments on the above suggestion to manage any "legacy" Wi-Fi devices, or alternative suggestions?	Large, high-density venue owners make periodic investments in a significant amount of equipment. Therefore, it is necessary to ensure that investments made in the next 5 years will only require software changes and would be required to disable the 6GHz band as of any legacy transition period. We encourage Ofcom to make a clear policy statement to provide certainty to the service providers.
Question 8: Do you have a view on the amount of spectrum that should be prioritised for Wi-Fi under the prioritised spectrum split option? Please provide evidence for your view.	Each venue has unique operational, architectural, and service delivery requirements, and as such, the demand for Wi-Fi and cellular technologies varies by location. We recommend a flexible approach that allows users to agree on terms based on demand and fair usage where possible. We would welcome a framework that enables venues to have a role in optimising how spectrum is made available and used within their environment, whether through in-building DAS, small cells, or high-capacity Wi-Fi networks, as part of the infrastructure design and installation process. This flexibility is essential to ensuring that connectivity solutions are tailored to the venue's specific needs and digital ambitions.
Question 9: Do you have any comments on our plan for a "phase 1" when Wi-Fi will be introduced?	N/A
Question 10: One variation on "phase 1" would be to only authorise Wi-Fi in client devices to "seed" the market. Would you have any views on this, or suggestions for other variations?	We propose that this variation permits approved locations to serve as trial sites during seed phases.
Question 11: Do you have any comments on our plan for a "phase 2" when mobile will be introduced?	N/A

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Question 12: Do you have a view on the amount of spectrum that should be prioritised for mobile under the prioritised spectrum split option? Please provide evidence for your view.	N/A
Question 13: Do you have any evidence or views about the geographical extent of mobile networks' likely deployment in Upper 6 GHz?	N/A
Question 14: Do you have any comments on our proposed phased approach to authorisation of both Wi-Fi and mobile in the Upper 6 GHz band?	N/A
Question 15: Do you have any comments on our proposal to not include very low power portable devices in the Upper 6 GHz band at this stage, but to keep this under review?	N/A
Question 16: Do you have any comments on our proposal to authorise the use of low-power indoor Wi-Fi access points and client devices to use 6425–7125 MHz?	N/A
Question 17: Do you have any comments on the proposed technical conditions?	Concerning the permitted deployment of indoor only, we recognise the importance of protecting incumbent users in the upper 6 GHz band and support a cautious, evidence-based approach to its use. However, we would welcome further consideration of how partially roofed venues could be defined within the indoor–outdoor framework. In such cases, we believe there is a case for revisiting the classification of these environments to enable appropriate and controlled use of the spectrum in the future.

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	We suggest developing flexible rules that do not restrict spectrum use in areas where the indoor-outdoor definition does not fit well with the definition.
Question 18: Do you have any comments on the proposed VNS draft?	N/A
Question 19: Do you have any suggestions for an appropriate mechanism for enhanced sensing, or comments on the proposed solution above?	During the DSIT-funded spectrum sandbox project, Real Wireless and its partners conducted field trials in the U6 GHz band to evaluate the potential for shared spectrum use between mobile and Wi-Fi deployments in overlapping geographical areas. Wi-Fi is deployed indoors in these areas while mobile base stations operate outdoors. The goal of the trials was to assess service degradation and test the suitability of cross-technology signalling (XTS) as a method to enhance sensing capabilities. This would help detect situations where the service areas of the two systems overlap insufficiently, prompting interference mitigation mechanisms. Field trial results demonstrate the advantages of XTS in enhancing Wi-Fi sensing capabilities. However, we emphasise that before any technology can be deployed in the upper 6 GHz range, it is essential for the industry to reach a consensus on standardising these features. Additionally, a robust conformance test must be defined to ensure effective implementation.
Question 20: Do you agree with our proposal to restrict Wi-Fi from transmitting in the 6650-6675.2 MHz band to protect the radio astronomy service? Please provide any technical evidence to support your view.	N/A
Question 21: Do you agree with our assessment of Wi-Fi coexistence with existing users of the band? If not, please provide details.	N/A

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Question 22: Do you have any evidence about the costs to operators of moving fixed links in and around "high density" areas (such as urban centres) to other bands?	N/A
Question 23: Do you have any comments on our initial assessment of our likely approach to coexistence between future mobile use and current users in the Upper 6 GHz band?	N/A
Question 24: Do you have any other comments on our policy proposals or any of the issues raised in this document?	N/A