Consultation response form

Please complete this form in full and return to sharingupper6ghz@ofcom.org.uk.

Consultation title	Consultation: Expanding access to the 6 GHz band for mobile and Wi-Fi services - Our approach to future mobile use in high density areas and incumbent users in this band
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Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see Ofcom's General Privacy Statement.

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Details are not confidential
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	The response is not confidential
For confidential responses, can Ofcom publish a reference to the contents of your response?	N/A

Your response

Please provide evidence in support of your views.

Question	Your response
Question 1: Do you agree with our proposed set of 88 high density areas for 6 GHz authorisation? If you disagree, please provide your reasoning and evidence.	Confidential? – N The DSA generally supports Ofcom's proposed identification of 88 high-density areas for future upper 6 GHz mobile authorisation. The DSA agrees that focusing potential high-power mobile deployment in areas where demand is likely to be highest is more proportionate than a nationwide designation, since mobile demand is unlikely to be uniform across the United Kingdom. However, the designation of a high-density area should not itself trigger restrictions on Wi-Fi operations. Rather, Automated Frequency Coordination (AFC) systems should be used to enable coexistence based on actual mobile deployments. Dynamic spectrum access mechanisms, including AFC, can support sharing under real-world conditions and help improve spectrum efficiency while avoiding unnecessary restrictions. Accordingly, DSA recommends that Ofcom: • review the high-density area framework periodically; • base future adjustments on observed deployment patterns; • incorporate sharing technologies wherever technically feasible; and • keep unused spectrum available for other applications rather than reserving it indefinitely. Taken together, these measures would ensure that Ofcom's high-density area framework remains adaptive, evidence-based, and supportive of both mobile growth and continued innovation in licence-exempt technologies.
Question 2: Do you agree with our proposal to clear fixed links from the Upper 6 GHz band in and around high-density areas, and to leave the band	Confidential? – Y / N

Question	Your response
open to new fixed link licence applications outside of high-density areas, subject to coordination?	The DSA recognizes the coexistence challenges between high-power mobile base stations and incumbent fixed links**.** However, the DSA does not support broad pre-emptive clearance of fixed links solely on the basis of anticipated future mobile deployment. The consultation itself acknowledges that mobile deployment outside high-density areas may be limited, while fixed links continue to provide important communications services. Removing incumbent users before actual deployment occurs could leave spectrum unused for long periods. Premature clearance risks leaving valuable spectrum unused if anticipated mobile deployments do not materialize as expected. AFC-based mechanisms offer a more proportionate way to support coexistence between fixed links, mobile systems, Wi-Fi operations, and other existing users. Such approaches can protect incumbent links while allowing mobile deployment when and where it is actually needed. Accordingly, the DSA recommends that Ofcom: • prioritize dynamic coordination solutions before revocation; • apply clearance only where actual deployment requires it; • preserve opportunities for incumbent operation where coexistence is feasible; and • consider AFC-based coordination mechanisms in future licensing frameworks. This approach would minimize unnecessary spectrum clearance, safeguard incumbent services, and ensure that spectrum resources are used efficiently in line with Ofcom's proportionate management objectives
Question 3: Do you agree with the approach we have set out to identify the links which will be affected by the proposed revocation?	Confidential? – Y / N

Question	Your response
	The DSA appreciates Ofcom's detailed technical analysis and the use of realistic propagation modeling, including ITU-R P.452 and operational adjustments**.** However, the methodology still appears to rely on hypothetical deployment scenarios for how mobile services in Upper 6 GHz may develop over time, especially in high-density areas. In practice, actual deployment may differ in terms of site locations, antenna configurations, traffic loading, spectrum use, and timing. As a result, some fixed links in the band could be identified for revocation even where the future interference risk is limited or uncertain. The DSA therefore recommends that Ofcom complement its current approach with database-assisted coordination, including AFC, before making permanent revocation decisions. Accordingly, the DSA considers the proposed methodology to be a useful initial assessment, but not a sufficient basis on its own for final revocation decisions. Final decisions should be proportionate, evidence-based, and grounded in real deployment conditions.
Question 4: Do you agree with our proposal to remove access to the frequencies 7110–7125 MHz for PMSE use, but to retain the option of allowing users to "borrow" spectrum from the Upper 6 GHz band for occasional major events?	Confidential? – N The DSA believes that it is important to preserve access to spectrum for PMSE use. Temporary assignments, local coordination, and database-assisted sharing can help make this possible while limiting disruption to other users.
Question 5: Do you agree with our proposal to require mobile base stations to protect RAS usage of the band at the levels specified?	Confidential? – N The DSA supports Ofcom's proposal to protect Radio Astronomy Service operations in the 6650–6675.2 MHz band. Radio astronomy delivers important societal benefits, and appropriate protection of these observations is necessary. The DSA considers the proposed protection requirements proportionate, given the limited number of affected sites, and the importance of the observations being protected.

Question	Your response
	At the same time, the DSA encourages Ofcom to explore coordination approaches that minimize constraints on mobile deployments while still providing adequate protection for radio astronomy operations.
Question 6: Do you have any comments on how we should manage coexistence between mobile and any other users in the Upper 6 GHz band (i.e., RAS, EESS, SRDs, FSS and MOD use)?	Confidential? – Y / N The DSA agrees with Ofcom's overall approach to coexistence with other incumbent services in the Upper 6 GHz band. For Earth Exploration Satellite Service (EESS), international coordination is preferable given the cross-border nature of satellite observations, and continued engagement toward WRC-27 is appropriate. For short-range devices and ultra-wideband applications, the DSA agrees that the risk of harmful interference appears limited. For UWB devices, the impact of mobile likely degrades the operation of UWB in this frequency range significantly. This has lead many industry players to stop deploying 6 GHz UWB products in their next generation products. For Fixed Satellite Services, the DSA supports implementation of the WRC-23 vertical elevation EIRP mask to protect satellite receivers. With respect to Ministry of Defence use and other incumbent services, dynamic spectrum management can play an increasingly important role. Ofcom states in Section 4.2 that coexistence between mobile and fixed links may be impractical. The DSA encourages Ofcom to continue evaluating AFC and other database-assisted coordination mechanisms, which may provide opportunities to facilitate sharing between mobile systems, fixed links, and other incumbent services while minimizing unnecessary spectrum restrictions. The DSA therefore encourages Ofcom to continue considering dynamic and database-based coordination approaches in future licensing and sharing frameworks.
Question 7: Do you have any comments on our assessment of the impacts of our proposals (to the extent not covered by previous questions)?	Confidential? – N No comment

Question	Your response
Question 8: Do you have any comments on our Equality impact assessment?	Confidential? – N No comment
Question 9: Do you have any comments on our Welsh Language impact assessment?	Confidential? – N No comment

Please tell us how you came across this consultation.

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