Consultation response form

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Consultation title	Consultation: Enabling automated frequency coordination (AFC) in the 6 GHz band
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Confidentiality

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Dynamic Spectrum Alliance Limited
http://www.dynamicspectrumalliance.org

Dynamic Spectrum Alliance response

The Dynamic Spectrum Alliance (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.

Question	Your response
Question 1: Do you agree with our overall registration process set out here and in more detail in Annex A3?	Confidential? – N The DSA strongly supports Ofcom's proposed three-phase AFC service provider ("AFCSP") registration framework, as set out in Section 3 and Annex A3. The proposed approach is pragmatic and proportionate, drawing appropriately on established implementations in the United States and Canada while incorporating necessary UK-specific adaptations. By facilitating the timely entry of multiple competitive AFC providers, the framework will enable rapid deployment of Standard Power (SP) Wi-Fi across the full 5925–7125 MHz band, supporting innovation, expanded outdoor connectivity, and efficient spectrum sharing. Ofcom's proposal is closely aligned with DSA's longstanding advocacy for globally harmonised and operationally ready AFC frameworks, including real-world deployment readiness assessments in jurisdictions. In particular: • **Efficiency and proportionality**: The absence of registration fees, the indefinite registration term, and the ability to leverage existing Wi-Fi Alliance and WInnForum testing frameworks minimise administrative burdens and lower barriers to market entry. This efficient approach accelerates innovation while maintaining robust oversight, consistent with DSA's support for agile, licence-exempt spectrum access models. • **Enterprise scalability**: The ability to support proxy registration for multi-device networks—particularly relevant for high-density enterprise environments—represents an important evolution from earlier European database models (e.g., TV white spaces). By enabling a single

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	registration to cover large, complex networks, this feature will facilitate scalable deployments in stadiums, campuses, transport hubs, and industrial settings, while also supporting broader public connectivity initiatives. • **UK-specific technical robustness**: The requirement to apply ITU-R P.452 propagation modelling in conjunction with Ofcom's DTM (Digital Terrain Model) and DLU (Digital Land Use) datasets appropriately strengthens protection for incumbent fixed links and radio astronomy services, while avoiding unnecessary public trial requirements that could delay deployment. The DSA supports this approach as technically sound. At the same time, Ofcom might also consider complementary methodologies—such as those proven effective in North America with higher-resolution terrain data—that could further enhance accuracy and efficiency while maintaining robust incumbent protection. The DSA encourages Ofcom to proceed expeditiously with implementation and looks forward to continued collaboration to ensure the framework delivers both innovation and robust protection for incumbents. Prompt adoption will reinforce the United Kingdom's leadership in 6 GHz innovation and deliver the benefits of full-band licence-exempt access in line with international best practice.
Question 2: Do you agree with our proposed registration conditions for AFCSPs?	Confidential? – N Yes. The DSA supports Ofcom's proposed registration conditions for AFC service providers (AFCSPs). The conditions strike an appropriate balance between ensuring robust incumbent protection and enabling a competitive, innovation-friendly AFC ecosystem. In particular, DSA welcomes the emphasis on: • **Accuracy and integrity of incumbent data**, ensuring that AFC calculations are based on reliable, up-to-date information and that protection of fixed links and other incumbents is grounded in transparent and verifiable inputs. • **Secure and resilient system operation**, including appropriate cybersecurity safeguards and operational continuity measures to maintain

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	confidence in AFC outputs. • **Accountability, auditability, and traceability**, enabling effective oversight while providing stakeholders with assurance that compliance obligations are being met. These principles are broadly consistent with AFC governance frameworks adopted in other leading jurisdictions. Alignment with established international practices will promote regulatory certainty, facilitate equipment harmonisation, and support economies of scale in the global 6 GHz ecosystem. At the same time, the DSA encourages Ofcom to ensure that the implementation of these conditions remains proportionate and technology-neutral. Compliance requirements should safeguard reliability and fairness without creating unnecessary procedural or financial barriers that could limit competition among AFC providers. A clear, objective, and predictable registration framework will support market entry, innovation, and long-term sustainability of the UK AFC environment.
Question 3: Do you agree with our proposed technical measures set out here and in more detail in Annex A5 to protect existing services in the 6 GHz band?	Confidential? – N Yes. The DSA supports Ofcom's proposed technical measures, as set out in the consultation and Annex A5, to protect incumbent services in the 6 GHz band. The package is proportionate, technically robust and aligned with approaches emerging in other leading AFC jurisdictions. The DSA particularly welcomes Ofcom's evidence-based methodology, including: • **Conservative and clearly defined protection criteria** for fixed links, satellite earth stations and other incumbent services, which ensure that aggregate interference remains comfortably within acceptable thresholds. • **Use of dynamic mitigation tools** such as location-specific exclusion areas, power limits and frequency constraints determined through AFC calculations—rather than relying only on static nationwide restrictions that can be either over- or under-protective. • **Dependence on accurate and regularly maintained incumbent databases as the**

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	foundation for interference calculations, recognising that database quality is central to both protection and regulatory confidence. • **Building Entry Loss (BEL)** as a key parameter within AFC systems to enable efficient and reliable coexistence between Wi-Fi and incumbent services in the 6 GHz band. Appropriate BEL assumptions are essential to accurately reflect real-world propagation conditions and to maximise spectrum utilisation while maintaining robust interference protection. AFC framework can improve incumbent protection compared with static rule sets alone. Automated, location-specific analysis allows operating parameters to be tailored in near real time, tightening constraints where incumbents are at greatest risk while avoiding unnecessary limits in low-risk areas. This both strengthens protection and supports more efficient spectrum utilisation. The DSA also encourages Ofcom to embed a periodic technical review mechanism into the framework. As operational experience accumulates, scheduled reviews of modelling assumptions, propagation parameters and protection margins will enable Ofcom to refine the framework where appropriate, ensuring it remains responsive to practical deployment experience over time.
Question 4: Do you agree with our proposals for the technical conditions and voluntary national specification to enable licence exempt operation of Wi-Fi devices under the control of an AFC system?	Confidential? – N Yes. DSA strongly supports Ofcom's proposals to establish technical conditions and a Voluntary National Specification (VNS) to enable licence-exempt operation of Wi-Fi devices under the control of an Automated Frequency Coordination (AFC) system. The DSA particularly welcomes: • **Preservation of licence-exempt status for Wi-Fi devices**, which sustains the innovation, accessibility, and low-barrier entry that have driven Wi-Fi's global success • **Creation of a Voluntary National Specification, giving manufacturers clear, practical guidance** on UK requirements while avoiding unnecessary rigidity or duplicative certification and allowing early deployment ahead of full European

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	harmonisation. • **A clear distinction between AFC-based coordination and individual licensing**, confirming that AFC is a technical mechanism for managing interference, not a step towards converting this spectrum to a licensed regime. This framework appropriately maintains the core principles of licence-exempt access while enabling higher-power, outdoor, and enterprise-grade deployments that would not be feasible under low-power indoor-only conditions. By combining defined technical parameters with dynamic AFC oversight, Ofcom's approach enhances spectrum efficiency and geographic reuse while ensuring robust protection for incumbent services. Ofcom proposes a maximum transmit power of 24 dBm for mobile client devices, which is 12 dB lower than the limit envisaged for standard-power access points and aligned with the current UK limit for low-power indoor (LPI) devices. This significant power imbalance could constrain the effective range and performance of standard-power deployments, potentially limiting their overall attractiveness and uptake. By contrast, the United States and Canada, higher transmit power levels—up to 30 dBm—are permitted for client devices. Allowing increased client device power can help improve link balance, extend coverage, and support more efficient utilisation of spectrum, particularly in scenarios where devices operate in close proximity to AFC-managed standard-power access points. In this context, the DSA encourages Ofcom to consider increasing the permitted transmit power for client devices to at least 30 dBm, and preferably up to 36 dBm, while taking into account the role of AFC systems in ensuring the continued protection of incumbent services.
Question 5: Do you have any representations to make on the Proposed Regulations: Wireless Telegraphy (Exemption)(Amendment) Regulations 2026?	The DSA supports the proposed amendments to the Wireless Telegraphy (Exemption) Regulations 2026. These amendments provide the necessary legal underpinning to enable licence-exempt operation of Wi-Fi devices under AFC control while maintaining appropriate technical and operational safeguards. In particular, DSA welcomes that the proposed changes: • **Extend licence-exempt status to AFC-controlled Standard Power devices**, allowing higher-power outdoor and enterprise deployments to proceed

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	without creating an individual licensing burden. • **Preserve clear, enforceable technical conditions** by linking exemption to compliance with defined equipment standards and AFC system requirements, thereby maintaining strong interference safeguards. • **Avoid imposing unnecessary administrative obligations on end users**, so that the regime remains simple, accessible and consistent with the core principles of licence-exempt spectrum use. The DSA considers these amendments essential to unlocking the full economic and connectivity benefits of the 6 GHz band. By modernising the exemption framework to accommodate AFC-enabled operation, Ofcom will enable more intensive and geographically efficient spectrum use while preserving regulatory clarity and robust incumbent protection. The DSA encourages Ofcom to proceed with implementation in a timely manner to provide certainty to manufacturers, service providers, and enterprise users planning 6 GHz deployments.
Question 6: Do you have any representations to make on the Proposed Regulations: Dynamic Spectrum Access Service (Frequencies) Regulations 2026?	The DSA supports the proposed Dynamic Spectrum Access Service (Frequencies) Regulations 2026. These Regulations establish a clear and durable statutory framework to support database-assisted spectrum sharing in the 6 GHz band. In particular, the proposed regulations provide a robust legal basis for: • **Database-assisted spectrum sharing**, by formally recognising dynamic spectrum access services and the role of AFC in coordinating use of the 6 GHz band. • **Clear designation of frequencies eligible for AFC operation**, giving certainty to service providers, equipment vendors and users about where AFC-controlled operation is permitted. • **Defined responsibilities and accountability for AFC service providers**, supporting effective oversight and ensuring that parties operating critical coordination infrastructure are clearly identified in law. By codifying the role of AFC systems within a statutory

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	framework, Ofcom strengthens both regulatory certainty and investment confidence. The DSA encourages timely adoption to support market readiness and early deployment of AFC-enabled services.
Question 7: Do you have any comments on our impact assessment (to the extent not covered by previous questions)?	The DSA agrees with Ofcom's impact assessment and considers it proportionate, evidence-based, and reflective of the wider benefits of expanded 6 GHz Wi-Fi capacity. The DSA particularly welcomes that the assessment recognises: • **Significant economic and productivity benefits from expanded 6 GHz Wi-Fi capacity**, enabling advanced enterprise networks, manufacturing, healthcare, education and digital public services that depend on reliable, high-performance wireless connectivity. • **AFC's critical enabling role** for higher-power and outdoor deployments, extending licence-exempt benefits beyond indoor consumer use to campuses, transport hubs, industrial sites, stadiums and rural connectivity initiatives. • **Limited incremental risk to incumbents under a properly implemented AFC regime**, supported by conservative protection criteria, accurate database inputs and dynamic coordination that adapts to real-world conditions. The DSA notes that AFC-based dynamic sharing demonstrably improves spectrum efficiency compared to static allocation models, delivering greater overall social welfare without requiring incumbent refarming or service disruption. This approach minimises opportunity costs while maximising capacity for new services. To sustain these benefits, the DSA encourages Ofcom to establish ongoing monitoring and periodic review mechanisms post-implementation. Real-world operational data from AFC deployments will strengthen the evidence base, enable calibration of technical parameters where justified, and ensure the framework remains agile, proportionate and responsive to deployment experience over time.

Question	Your response
Question 8: Do you have any comments on our Equality impact assessment?	The DSA has no additional comments on Ofcom's Equality Impact Assessment and agrees with the conclusion that the proposals are unlikely to give rise to adverse impacts in relation to protected characteristics under the Equality Act 2010. The DSA further notes that enhanced access to high-capacity, licence-exempt connectivity in the 6 GHz band may support broader digital inclusion objectives. In particular, improved Wi-Fi performance in public sector settings, educational institutions, healthcare facilities, transport environments, and community spaces can help expand access to digital services and reduce connectivity disparities. By enabling more efficient spectrum use through AFC while maintaining low barriers to access, the proposed framework has the potential to deliver positive social and economic benefits across diverse user groups.
Question 9: Do you have any comments on our Welsh Language impact assessment?	No comments
Question 10: Do you have any other comments relating to this consultation?	The DSA encourages Ofcom to proceed with timely implementation to provide market certainty and maintain UK leadership in 6 GHz policy. The DSA stands ready to support Ofcom through the sharing of international experience, technical expertise, and stakeholder engagement as AFC deployment progresses.

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