Consultation response form

Please complete this form in full and return to sharingupper6GHz@ofcom.org.uk.

Consultation title	Expanding access to the 6 GHz band for commercial mobile and Wi-Fi services
Full name	Martha Suarez
Contact phone number	+57 3175179455
Representing (delete as appropriate)	Organisation
Organisation name	Dynamic Spectrum Alliance, DSA
Email address	Martha.Suarez@dynamicspectrumalliance.org

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.

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For confidential responses, can Ofcom publish a reference to the contents of your response?	N/A

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 have any comments on our proposal to move ahead as soon as possible with a prioritised band split with 160 MHz prioritised for Wi-Fi and 540 MHz for mobile?	Confidential? – N The DSA welcomes Ofcom's proposal to move forward swiftly with a prioritised band split, particularly the identification of a clean 160 MHz block (6425–6585 MHz) under priority conditions for WAS/RLAN, alongside AFC-controlled opportunistic Wi-Fi access to the mobile-prioritised spectrum (6585–7125 MHz). This approach represents a pragmatic balance between immediate Wi-Fi needs and longer-term IMT planning. Key Points of Support: • **Securing Contiguous Spectrum for Wi-Fi**: A contiguous 160 MHz block is the minimum required to enable efficient channel reuse in dense enterprise, campus, and public environments. Without this, Wi-Fi 7 cannot deliver its full performance potential in high-demand scenarios. • **Opportunistic Access via AFC**: AFC-managed access to the upper portion maximises spectrum utilisation by enabling Wi-Fi to use mobile-prioritised spectrum where feasible, complementing prioritised access while ensuring incumbent protection. • **Regulatory Certainty for Investment**: Clear identification of this block under the same conditions as the lower 6 GHz band provides long-term certainty for enterprises, manufacturers, and service providers. This ensures confidence in scaling deployments and accelerates innovation. • **Avoiding Spectrum Inefficiency**: Moving ahead now prevents valuable spectrum from lying idle pending WRC-27 outcomes. Wi-Fi traffic is already

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	predominantly indoor and complements IMT by offloading mobile networks. Immediate clarity allows the band to deliver economic and social value today. While the DSA's long-term global position remains that the entire 5925–7125 MHz band should be available licence-exempt, we recognise the UK's balanced approach and support the prioritised split as a pragmatic and forward-looking framework.
Question 2: Do you agree with our proposal to authorise Wi-Fi in the Wi-Fi priority portion of the Upper GHz band under the same technical conditions as the Lower 6 GHz band (low power indoors, very low power and if under AFC control, higher power Wi-Fi)?	Confidential? – N The DSA strongly supports Ofcom's proposal to authorise Wi-Fi in the priority portion of the Upper 6 GHz band under the same technical conditions as the Lower 6 GHz band. Extending the established framework for Low Power Indoor (LPI), Very Low Power (VLP), and Standard Power (SP) operation under Automated Frequency Coordination (AFC) across the 5925–6585 MHz range is both technically sound and economically efficient. In particular, DSA welcomes the emphasis on: • **Enable global ecosystem scale**: Harmonising rules across the full 6 GHz band reduces device and chipset costs, avoids regional fragmentation, and ensures manufacturers can deliver equipment at scale. • **Minimise equipment complexity**: Consistency between the lower and upper segments provides a predictable policy environment, giving enterprises and service providers the confidence to invest in long-term deployments. • **Accelerated rollout**: Equipment already designed for the Lower 6 GHz band can be seamlessly extended to the upper portion, enabling rapid adoption without additional delays or redesign. SP operation under AFC control is critical to unlocking the full economic and connectivity potential of the band. AFC frameworks provide robust, database-driven protection for incumbent services while enabling reliable coverage for enterprise and campus networks, supporting industrial and mission-critical connectivity, extending outdoor fixed wireless broadband, and enhancing public venue and transport connectivity. International experience demonstrates that AFC-based systems deliver conservative, automated protection for incumbents while

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	at the same time significantly improving spectrum efficiency compared to static, low-power-only approaches. Applying the same technical conditions across both lower and upper 6 GHz segments ensures regulatory clarity, ecosystem alignment, and immediate economic value. For these reasons, the DSA fully endorses Ofcom's proposal as a forward-looking framework that balances innovation, investment certainty, and incumbent protection.
Question 3: Do you have any comments on our proposal to allow Wi-Fi devices early access to the mobile priority portion of the band under AFC control and under the same terms as AFC use in the Lower 6 GHz?	The DSA strongly supports Ofcom's proposal to allow Wi-Fi early access across the mobile priority portion of the band under AFC-controlled SP conditions. This approach reflects a balanced, two-layer framework that maximises near-term spectrum utility while preserving long-term policy flexibility: • Layer 1: Licence-exempt Priority Block (6425–6585 MHz) for LPI/VLP/SP: A clean, contiguous 160 MHz segment under Wi-Fi priority conditions, providing regulatory certainty for long-term investment, efficient channel reuse, and ecosystem development. • Layer 2: Non-Prioritised Access (6585–7125 MHz): Immediate authorisation of AFC-managed SP, so that spectrum is actively and productively used unless and until IMT deployments materialise in specific geographic areas. The DSA considers this framework delivers immediate consumer and enterprise benefits by leveraging the mature and globally deployed Wi-Fi 6E and Wi-Fi 7 ecosystems. The DSA encourage Ofcom to implement both Layer 1 and Layer 2 frameworks simultaneously—prioritised access plus early AFC extension—to accelerate benefits and demonstrate practical spectrum sharing ahead of European harmonisation. AFC's geographic precision enables seamless adaptation should IMT deploy selectively, without requiring regulatory restructuring. This pragmatic approach delivers connectivity value today while maintaining strategic optionality. Finally, given the strategic importance of additional

Question	Your response
	spectrum for Very Low Power (VLP) applications, we encourage Ofcom to continue considering options that would allow VLP access to mobile-prioritised spectrum in the Upper 6 GHz band.
Question 4: Do you have any comments on our approach to protect existing uses in the Wi-Fi priority portion (the bottom 160 MHz) of the Upper 6 GHz band?	The DSA supports Ofcom's approach to protecting existing uses in the Wi-Fi priority portion of the Upper 6 GHz band and highlights several key considerations. Protecting incumbent fixed and satellite services must remain a central priority, ensuring that these critical operations are safeguarded as new Wi-Fi deployments expand. At the same time, it is essential that any future IMT deployment in adjacent spectrum incorporates robust out-of-band emission (OOBE) limits to protect the designated Wi-Fi priority block. We recommend that Ofcom's framework explicitly recognise Wi-Fi operating in the 6425–6585 MHz segment as protected WAS/RLAN spectrum under priority conditions. This provides symmetric regulatory clarity, giving enterprises, service providers, and equipment vendors the confidence to invest in long-term deployments. International experience with AFC systems demonstrates that database-driven coordination can deliver conservative protection margins for fixed links while enabling efficient Wi-Fi use. By combining clear regulatory recognition with proven technical safeguards, Ofcom's approach ensures both incumbent protection and productive spectrum use, aligning with best practices globally.
Question 5: Do you have any comments on our approach to protect existing services in the mobile priority portion (the top 540 MHz) of the Upper 6 GHz band? Note: If you have any comments regarding the protection criteria for uses as specified in the AFC database, please submit them in the separate AFC Framework Consultation.	The DSA agrees that protection of incumbent services in the mobile priority portion of the Upper 6 GHz band should remain paramount. Ensuring continuity and reliability for existing fixed and satellite operations is essential to maintaining confidence in the UK's spectrum management framework. At the same time, protection measures should be technically justified, evidence-based, and proportionate to the demonstrated risk of harmful interference. Measures that are overly conservative or static in nature risk unnecessarily constraining spectrum use and limiting the broader economic and connectivity benefits the band can deliver. Modern coordination mechanisms — in particular AFC — provide a more efficient alternative to purely static

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	approaches. AFC enables: • Database-driven, location-specific interference protection; • Dynamic power control based on real-time operational parameters; • More precise coexistence than broad exclusion zones. This allows robust incumbent protection while significantly improving spectrum utilisation. Should IMT be introduced in the upper portion of the band in the future, it will be essential to ensure: • Strong and clearly defined OOBE limits to safeguard adjacent protected WAS/RLAN spectrum operating under priority conditions; • Transparent and predictable coordination frameworks to support stable coexistence; • Continued non-prioritised Wi-Fi access in geographic areas where IMT is not actively deployed. Preserving such non-prioritised access is particularly important to avoid spectrum lying fallow in the absence of active mobile use. By combining firm incumbent safeguards with proportionate, technically grounded coexistence mechanisms, Ofcom can strike an appropriate balance between protecting existing services and enabling productive, innovation-driven use of the Upper 6 GHz band.
Question 6: Do you have any comments on our assessment of the impacts of our proposals (to the extent not covered by previous questions)?	The DSA has no additional comments.
Question 7: 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-

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	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 indirect but positive social and economic benefits across diverse user groups.
Question 8: Do you have any comments on our Welsh Language impact assessment? Please provide evidence in support of your views.	The DSA has no additional comments.

Please tell us how you came across this consultation.

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