Consultation response form

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

Consultation title	Notice of proposals to make Wireless Telegraphy (Exemption) (Amendment) (No. 3) Regulations 2026
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.

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

Question	Your response
Introduction	The Dynamic Spectrum Alliance (DSA) commends Ofcom's leadership in bringing forward proposals to extend licence-exempt access into the Upper 6 GHz band and supports the proposed Wireless Telegraphy (Exemption) (Amendment) (No. 3) Regulations 2026. The DSA recognises Ofcom's strategic and pragmatic vision in developing a balanced and forward-looking framework that delivers immediate benefits for consumers, businesses and public services while preserving flexibility for future mobile services. Providing an additional 160 MHz of licence-exempt spectrum within 6425–6585 MHz, alongside a framework for Automated Frequency Coordination (AFC) across the remainder of the Upper 6 GHz band, represents an important step towards more efficient spectrum utilisation. The DSA welcomes Ofcom's recognition that Wi-Fi and mobile technologies are complementary components of the UK's digital infrastructure. The proposed framework provides regulatory certainty for investment in next-generation Wi-Fi while maintaining the flexibility to accommodate future technological developments. The DSA also commends Ofcom's continued commitment to evidence-based and technology-neutral spectrum management. Dynamic spectrum access and AFC have an increasingly important role in enabling more efficient use of spectrum while maintaining appropriate protection for incumbent services and supporting international harmonisation. While supporting both the proposed Regulations and the wider policy framework, the DSA believes continued implementation should be guided by robust technical evidence, realistic coexistence studies and close alignment with ongoing work in CEPT, ETSI and the ITU-R. The DSA has therefore included Annex A – Strategic Observations on the Future Evolution of the Upper 6 GHz Framework. The Annex provides constructive recommendations to support future implementation and international engagement and is intended to complement, rather than revisit, the policy decisions reflected in the Proposed Regulations and the accompanying Statement. In summary, the DSA: • Supports proposed Regulations implementing licence-exempt access within 6425–6585 MHz. • Welcomes Ofcom's balanced Upper 6 GHz framework, which combines dedicated licence-exempt spectrum with a pathway for future mobile deployment enabled by AFC. • Recognises the UK's leadership in adopting modern spectrum-sharing approaches that maximise spectrum utilisation while protecting incumbent services. • Encourages continued development of evidence-based technical conditions founded on robust coexistence studies, and realistic deployment assumptions.

	• Supports continued engagement with CEPT, ETSI and the ITU-R to promote harmonised technical frameworks and maximise global equipment interoperability. • Offers observations contained within Annex A as constructive recommendations to support the successful long-term implementation and evolution of Ofcom's Upper 6 GHz framework. The DSA looks forward to continuing its constructive engagement with Ofcom, Government, industry and international stakeholders as the Upper 6 GHz ecosystem continues to evolve.
Question 1: Do you have any comments on our drafting of the Proposed Regulations? Please give reasons supported by evidence for your views.	Confidential? N The DSA supports the proposed Regulations and considers that they accurately implement Ofcom's policy decision to extend licence-exempt access into the 6425–6585 MHz frequency band using the same regulatory approach that has already proven successful within the Lower 6 GHz band. Providing an additional harmonised 160 MHz of licence-exempt spectrum represents a significant enhancement to the UK's wireless infrastructure. It will immediately increase network capacity, improve spectrum reuse in high-density environments and support innovative applications requiring high throughput, predictable latency and high reliability. The Regulations provide important regulatory certainty for manufacturers, equipment vendors, network operators, enterprises and consumers. Aligning the technical conditions for 6425–6585 MHz with those already established for the Lower 6 GHz band (including low power indoor (LPI) and very low power (VLP) use) simplifies equipment development, accelerates market availability and encourages continued investment in next-generation Wi-Fi technologies. Leaving flexibility for outdoor and higher power use in the remaining 540 MHz mobile priority portion under AFC control, will better enable Wi-Fi use across the full 6 GHz band while managing coexistence with mobile deployment. The DSA particularly welcomes Ofcom's decision to establish a dedicated licence-exempt portion within the Upper 6 GHz band whilst simultaneously preserving flexibility for future mobile deployment. Rather than leaving valuable spectrum unused pending longer-term market developments, the proposed framework enables immediate public benefit whilst maintaining future policy options. The DSA therefore considers that the proposed Regulations appropriately implement Ofcom's policy objectives and supports their adoption.
Question 2: Do you have any comments relating to any other matter in this Notice?	Confidential? N The DSA welcomes the wider policy framework described within Ofcom's accompanying Statement and believes it represents one of the most progressive Upper 6 GHz spectrum strategies currently under development internationally. The framework appropriately recognises that Wi-Fi and future mobile systems are complementary technologies rather than competing alternatives. By enabling immediate licence-exempt access within 6425–6585 MHz whilst

	establishing a pathway for future mobile deployment supported by Automated Frequency Coordination (AFC) across 6585–7125 MHz, Ofcom has adopted a pragmatic spectrum management framework that supports both current market demand and future innovation. The DSA also welcomes Ofcom's recognition that modern spectrum management should seek to maximise utilisation of valuable spectrum resources rather than reserving large portions of spectrum for services that may not require deployment for many years. The continued use of AFC represents an important evolution in spectrum management policy. Dynamic spectrum access technologies have now matured to the point where they can provide practical and effective mechanisms for enabling spectrum sharing whilst maintaining appropriate protection for incumbent services. The UK's implementation therefore has the potential to provide valuable experience that may inform future European and international regulatory developments. The DSA further welcomes Ofcom's continued engagement with CEPT, ETSI and other international organisations. Maintaining alignment with international technical work wherever practical will maximise equipment availability, encourage economies of scale and facilitate international harmonisation whilst allowing the UK to continue demonstrating regulatory leadership. Accordingly, the DSA supports the overall direction of Ofcom's Upper 6 GHz framework.
Additional observations	The DSA recognises that this consultation primarily seeks comments on the proposed Regulations implementing Ofcom's policy decision for licence-exempt access within 6425–6585 MHz. However, the accompanying Statement also establishes the broader strategic framework for the future evolution of the Upper 6 GHz band, including future work on Automated Frequency Coordination, coexistence methodologies, technical implementation, international harmonisation and longer-term spectrum evolution. Accordingly, DSA has included Annex A – Strategic Observations on the Future Evolution of the Upper 6 GHz Framework. The observations contained within the Annex are not intended to revisit the policy decisions reflected in either the Statement or the Proposed Regulations. Rather, they are offered as constructive recommendations that may assist Ofcom during the next phases of implementation and future engagement within CEPT, ETSI and the ITU-R. They reflect DSA's international experience in spectrum sharing and dynamic spectrum access and identify implementation principles that DSA believes will maximise spectrum efficiency, encourage innovation and support international harmonisation.

Annex A: Strategic Observations on the Future Evolution of the Upper 6 GHz Framework

A1. Preserve the Long-Term Integrity of the Wi-Fi Priority Spectrum

The designation of 6425–6585 MHz for licence-exempt operation provides important long-term regulatory certainty for investment in Wi-Fi technologies and supporting ecosystems. The value of this spectrum depends not only upon regulatory access rights but also upon the practical ability of equipment to operate efficiently throughout the entire 160 MHz.

As technical conditions for adjacent IMT systems are developed, DSA encourages Ofcom to ensure that coexistence studies are based upon realistic deployment assumptions and internationally recognised engineering methodologies. Technical parameters governing adjacent-band operation, including out-of-band emissions and block-edge performance, should be derived from robust technical evidence so that future IMT deployments do not unnecessarily constrain the practical utility of the Wi-Fi priority spectrum.

A2. Continue UK Leadership on Automated Frequency Coordination

The DSA strongly supports Ofcom's decision to adopt Automated Frequency Coordination as the preferred mechanism for enabling licence-exempt access across 6585–7125 MHz.

Database-assisted spectrum management has matured into a practical regulatory tool capable of increasing spectrum utilisation whilst maintaining appropriate protection for incumbent users. The UK's implementation provides an important opportunity to demonstrate the effectiveness of dynamic spectrum access in commercial deployments and to contribute practical experience to European and international regulatory discussions.

Future AFC frameworks should remain technology-neutral, scalable and capable of accommodating continued innovation in spectrum coordination techniques.

A3. Maintain Regulatory Flexibility

The Upper 6 GHz framework continues to evolve through work within CEPT and the ITU-R. DSA encourages Ofcom to retain sufficient regulatory flexibility to respond to future technical studies, evolving market demand and international harmonisation activities.

Future developments may include refinements to spectrum sharing methodologies, enhanced AFC capabilities, enterprise authorisation models and additional opportunities for licence-exempt access. Maintaining flexibility will enable future regulatory decisions to be based upon technical evidence and practical implementation experience.

A4. Continue Supporting International Harmonisation

International harmonisation remains essential for achieving equipment interoperability, economies of scale and efficient global spectrum utilisation.

DSA welcomes Ofcom's participation within CEPT, ETSI and the ITU-R and encourages continued alignment wherever practical. At the same time, carefully implemented national innovation can provide valuable technical evidence that informs future regional and global regulatory frameworks.

The UK's experience with AFC and innovative spectrum sharing approaches has the potential to influence future international spectrum management policies positively.

A5. Promote Technology-Neutral Spectrum Management

Future spectrum policy should continue to be guided by technology-neutral principles that enable different wireless platforms to coexist and complement one another.

Rather than viewing licence-exempt and licensed services as competing approaches, regulatory frameworks should recognise that modern connectivity increasingly depends upon multiple wireless technologies operating together. Fibre provides high-capacity connectivity to homes, businesses and public buildings. Wi-Fi provides the final wireless connection used by the overwhelming majority of connected devices. Mobile networks provide ubiquitous wide-area coverage and mobility. Together they form complementary elements of national digital infrastructure.

Spectrum policy should continue to support balanced development across these technologies to maximise consumer benefit, economic productivity and digital inclusion.

A6. Dynamic Spectrum Access as a Core Spectrum Management Tool

The DSA encourages Ofcom to continue recognising dynamic spectrum access as an increasingly important component of modern spectrum management.

Advances in cloud computing, automated coordination, geolocation technologies and database-assisted spectrum management now make it possible to support substantially more intensive spectrum utilisation whilst maintaining appropriate protection for incumbent services.

Future regulatory frameworks should therefore continue evaluating dynamic spectrum access alongside traditional exclusive licensing and licence-exempt approaches when determining the most appropriate authorisation model for individual frequency bands.

A7. Evidence-Based Development of Future Technical Conditions

The DSA encourages Ofcom to continue supporting the development of future technical conditions that are firmly grounded in internationally recognised technical assumptions and robust coexistence studies.

Parameters such as transmit power, out-of-band emissions, block-edge performance and realistic deployment characteristics should be derived consistently with the ongoing work in 3GPP, CEPT, ETSI, and the ITU-R. This will help ensure that future technical conditions facilitate efficient deployment of both IMT and licence-exempt systems whilst maintaining appropriate protection for adjacent-band operations and other authorised services.

An evidence-based approach will provide greater regulatory certainty, improve international harmonisation and minimise the risk of unnecessary technical constraints.

A8. Looking Forward

The DSA believes Ofcom has established a pragmatic and forward-looking framework for the Upper 6 GHz band that balances immediate consumer benefit with long-term regulatory flexibility.

By combining dedicated licence-exempt spectrum, dynamic spectrum sharing and a pathway for future mobile deployment, the UK is demonstrating how modern spectrum management can deliver more intensive and efficient spectrum utilisation whilst preserving future policy options.

The DSA looks forward to continuing to work with Ofcom, Government, CEPT, ETSI, the ITU-R and industry stakeholders as the Upper 6 GHz ecosystem continues to evolve.