

**Consultation response form**

Please complete this form in full and return to [SharedAccess6GHz@ofcom.org.uk](mailto:SharedAccess6GHz@ofcom.org.uk).

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| **Consultation title** | Enabling spectrum sharing in the upper 6 GHz band |
| **Full name** | Paul Nikolich, Chair of IEEE 802 |
| **Contact phone number** |  |
| **Representing (delete as appropriate)** | Organisation |
| **Organisation name** | IEEE 802 LAN/MAN Standards Committee |
| **Email address** | IEEE802radioreg@ieee.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](http://www.ofcom.org.uk/about-ofcom/foi-dp/general-privacy-statement).

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| **Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.** | Nothing |
| **Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.** | None |
| **For confidential responses, can Ofcom publish a reference to the contents of your response?** | Yes |

IEEE 802 LAN/MAN Standards Committee (LMSC) respectfully submits these responses to Ofcom.

IEEE 802 LMSC is a leading consensus-based industry standards body, producing standards for wireless networking devices, including wireless local area networks (“WLANs”), wireless specialty networks (“WSNs”), wireless metropolitan area networks (“Wireless MANs”), and wireless regional area networks (“WRANs”). We appreciate the opportunity to provide these comments to Ofcom.

IEEE 802 is a committee of the IEEE Standards Association and Technical Activities, two of the Major Organizational Units of the Institute of Electrical and Electronics Engineers (IEEE). IEEE has about 420,000 members in about 190 countries and supports the needs and interests of engineers and scientists broadly. In submitting this document, IEEE 802 acknowledges and respects that other components of IEEE Organizational Units may have perspectives that differ from, or compete with, those of IEEE 802. Therefore, this submission should not be construed as representing the views of IEEE as a whole.[[1]](#footnote-1)

**Your response**

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| **Question** | **Your response** |
| **Question 1: Do you agree with our proposals to add the 6425-7070 MHz band to the Shared Access framework?** | Confidential? – Y / **N**  The SAF is already implemented for four other bands[1], but to our knowledge no assessment is available of the outcome. In general, IEEE 802 technologies depend on unlicensed spectrum and our members do innovation in this space, however, we understand that this was not the objective of this consultation.   [1] <https://www.ofcom.org.uk/__data/assets/pdf_file/0035/157886/shared-access-licence-guidance.pdf> |
| **Question 2: Do you have any comments on potential uses for this licence?** | Confidential? – Y / **N**  This license will effectively block innovative uses of the upper 6GHz in home networks. We believe Ofcom should assess whether its previous SAF was successful in bringing about the innovative environment foreseen by its previous framework before advancing this proposal. More specifically, from perspective of IEEE 802.11, we think it is important to have a feasibility assessment on co-existence with RLAN technologies, such as 802.11, in case such sharing is envisioned as an option in the future. |
| **Question 3: Do you have any comments on our proposed licence conditions, licence fee or minimum separation distance?** | Confidential? – Y / **N**  **No comment** |
| **Question 4: Do you have any comments on our technical analysis?** | Confidential? – Y / **N**  **No comment** |

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1. This document solely represents the views of the IEEE 802 LAN/MAN Standards Committee and does not necessarily represent a position of either the IEEE, the IEEE Standards Association or IEEE Technical Activities. [↑](#footnote-ref-1)