



The UK Wireless Internet Service Providers Association

“Statement of Strategic Priorities” UKWISPA Response to DCMS Consultation

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Abstract — This document contains the response to the Statement of Strategic Priorities by UKWISPA.

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1 Introduction

UKWISPA and INCA have great pleasure in responding to the DCMS consultation on the “Statement of Strategic Priorities”.

2 Response to Questions

Do you agree with the Government’s strategic priorities and desired policy outcomes for telecommunications, the management of radio spectrum and postal services?

§13 and §24: UKWISPA welcomes the Government’s commitment to ensure that all areas of the UK have access to high-capacity connectivity, and agrees that the “outside in” approach is an effective means to achieve the strategic priority. DCMS should consider whether the jump from no digital service to gigabit services is an

worthy investment and that an intermediate step of superfast or ultrafast might be a reasonable intermediate step worth paying for at a fraction of the cost.

§16 and §19: UKWISPA agrees that access to the national network of underground ducts and poles can encourage competitive network deployment. Such facilities can enable fibre backhaul for mobile and fixed wireless.

§23: There are many rural or remote communities that do not have access to decent broadband services, where a minimum speed of 10 Mbit/s will result in a welcome and substantial upgrade. WISPA welcomes the Government's commitment to the USO. We support the policy of reviewing the USO speed and service level periodically. With the expected growth in alternative operators UKWISPA also believe that the prime contractors for this service should be reviewed periodically to ensure that the nation is provided with a cost effective service.

§30: It is clear that the 700 MHz spectrum will be important in providing mobile coverage in rural areas, and along the road network. It is unreasonable to expect that the 3.6 GHz to 3.8 GHz spectrum will provide mobile coverage over large areas. We expect deployment of mobile services in the 3.6 GHz band will be largely restricted to areas with high population density (city centres) or areas with a high number of nomadic users (sports stadia, transport hubs, and etc.).

§35: UKWISPA recognises the importance of introducing flexible, shared spectrum models, and welcomes the release of additional public sector spectrum. In particular, we welcome the commitment to ensure the efficient use of spectrum, and to prevent under-utilisation of spectrum. It is UKWISPA's view that the 3.4 GHz to 4.2 GHz band can be used most effectively to deliver broadband to premises by Fixed Wireless Access outside areas of high population density.

Ofcom should review the transmitter power limits proposed for operation in the 3.6 GHz band to better reflect the needs of FWA operators. Terminal equipment in customers' premises should be allowed the same transmitter power limits (measured as an EIRP) as the base station equipment, allowing a better balance between uplink and downlink capacity. The power limit should be increased to match limits allowed in other countries; this will allow construction of networks with greater link range, consistent with a viable business case for coverage in remote rural communities, and will encourage the use of cost-effective network infrastructure products already available for a global market.

§36: UKWISPA recognises the importance of introducing flexible, shared spectrum models, and welcomes the release of additional public sector spectrum. Spectrum sharing models are a vital means to enable new players to enter the market, and to unlock opportunities for innovative new applications. We particularly welcome the focus on coverage extensions to rural communities and the use of Fixed Wireless Access (FWA) to premises in small and large, often rural areas. (This may involve

the FWA systems having longer range than so far envisaged by Ofcom particularly when the housing density is low.)

§37 bullet 1: you have addressed releasing 1GHz of spectrum in the 26GHz band. We hope you will also make that spectrum a sharing band in a similar manner to 3.4–4.2GHz.

§37 bullet 3: you have addressed sharing in 3.6–4.2GHz. Recognising that lower cost equipment will initially be available in 3.4–3.8GHz, we hope you meant 3.4–4.2GHz. This spectrum is key to achieving the strategic priorities and in the recent consultation (see section 3) demonstrates how important the detail is.

§38: The “use it or lose it” conditions will provide a useful incentive for MNOs to release under-used spectrum.

§39: We agree that Ofcom should be required to report on spectrum utilisation.

§43: We emphatically agree that fixed fibre and wireless are complementary technologies, and that wireless will provide a viable alternative for fibre in some areas. Fibre will be important as a backbone technology even when wireless is used for access.

§61 and §62: UKWISPA recognises the vital national importance of maintaining the security of communications networks and services. We welcome Ofcom’s role in establishing test programmes and highlighting best practice. It seems likely that some regulation might be needed to provide confidence that operators’ networks are protected effectively.

However, it is not at all clear from the strategic priorities how such regulations might be framed and enforced, and how the responsibility of complying with regulations might be imposed on network equipment manufacturers and operators. We hope that Ofcom will consult with industry and security experts to develop a relevant and effective approach to ensuring network security.

Does this document set out clearly the role of Ofcom in contributing to the Government’s strategic priorities and desired outcomes?

The document sets out the Strategic Priorities clearly. Ofcom’s role is clearly defined to the extent that it must have regard to the clear statements in the SSP when exercising its regulatory functions. Ofcom will have to decide on the appropriate and effective tactics to achieve the Strategic Priorities, and we encourage DCMS to monitor the development of the regulatory framework to ensure that the expected benefits and objectives are being delivered.

3 Spectrum

In the Future Telecoms Infrastructure Review (FTIR), significant effort was put into a change in policies with regard to the efficient use of spectrum. In the recent Ofcom consultation “Enabling Opportunities for Innovation”, it is clear that Ofcom have moved a long way from the previous consultations on the use of this spectrum, which is to be welcomed.

However, rural communities require provision of superfast or ultrafast broadband before 2033 which is the date for completing the rollout of fibre to each home and business. Lower cost and faster roll out methods of access than fibre to the home must be enabled much before 2033. Indeed, Scotland aspire to enable 100% of homes and businesses access to superfast by 2021. The program is called Reaching 100% Program (R100).

Many parts of the United Kingdom have considerable difficulties in using fibre to achieve this aim in some areas because of the low housing density. There seems to be a shortage of construction staff to lay the fibre to all of these places. There has to be another choice.

Fixed Wireless Access provided by Wireless Internet Service Providers (WISPs) is such a solution which has so far provided service to more than 200,000 homes in the short period of the last 3 years.

WISPs are currently restricted to using the light licensed or unlicensed spectrum for 5.470GHz to 5.850GHz. The rules for this spectrum make it relatively short range, vulnerable to interference and suffers from large losses through trees.

Ofcom have through their consultation offered that they will license WISPs to provide service where the mobile operators are not using the spectrum and this is to be welcomed. Unfortunately the conditions are not ideal:

- the terminal station power does not allow for long range circuits,
- the base station power is not as high as is being offered in other parts of the world, and
- the base station powers are not high enough to provide efficient deployment in the lower density areas.

In the view of UKWISPA, the power specification must recognise the longest likely range of a base station which is longer for lower densities. These lower densities are also likely to be a long way from cities where there may be a different use of the spectrum for 5G and thus the higher powers are unlikely to cause interference to the spectrum owner.