



Dear Ofcom team,

Please find below the FCS's response to Ofcom's consultation: Expanding access to the 6 GHz band for mobile and Wi-Fi services. Our response is not confidential, and we are happy for it to be published on the Ofcom website.

It would be very helpful if you could acknowledge receipt of our response.

The FCS represents companies which provide professional communications solutions to business users. Our members deliver telecommunications services via mobile and fixed line telephony networks, broadband, satellite, wi-fi and business radio. Our members' customers range from SMEs, home-workers and micro-businesses up to the very largest private enterprises and public sector users. FCS is the largest trade organisation in the professional communications arena, representing the interests of circa 350 businesses which supply B2B services nationwide.

Given our membership base, we have not answered the individual questions posed by the consultation, but we do have a number of important points of principle to raise.

The FCS supports broader spectrum access in the Upper 6 GHz band but is concerned that smaller CPs and resellers will face difficulties with accessing such bands and in deploying AFC-managed standard-power Wi-Fi and participating in high-density urban mobile deployments. We urge Ofcom to ensure that the needs of the complex supply chain are taken into account and that Mobile Network Operators be required to provide wholesale access to the Upper 6GHz band on a fair and reasonable basis.

Ofcom should also consider tiered licensing approaches and coordinated network infrastructure support to ensure that smaller providers can compete effectively. Small communications providers and local resellers are part of a complex supply chain that provides essential connectivity and innovative solutions to 1000s of businesses throughout the country. The complex supply chain is vital to UK economic growth and requires a supportive regulatory regime to flourish. The FCS believes that each specific spectrum range is in effect a local monopoly, and should be treated as such, with access conditions on fair commercial terms that do not create artificial financial and/or any operational barriers.

We agree with Ofcom that it is important that potential harmful interference with other bands should be addressed and support Ofcom's role in this area.

The FCS would be very happy to discuss our response and the impact on the complex supply chain with Ofcom if that would be helpful.

Best wishes,

Stefanie

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