



Consultation response form

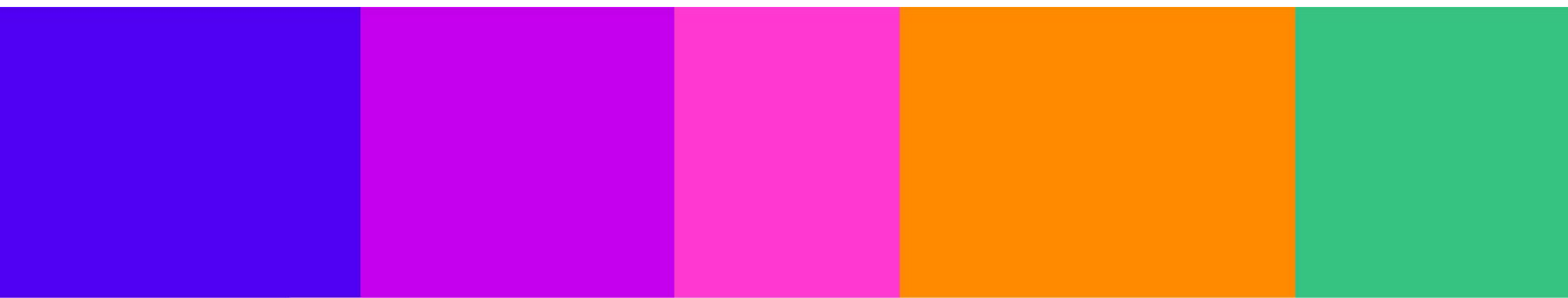
Please complete this form in full and return to AFC@ofcom.org.uk.

Consultation title	Enabling Automated Frequency Coordination (AFC) in the 6 GHz band
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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.	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



Your response

Question	Your response
<p>Question 1: Do you agree with our overall registration process set out here and in more detail in Annex A3?</p>	<p>Confidential? – N</p> <p>WInnForum agrees with Ofcom’s proposed overall three-phase registration process (application; testing and evaluation; registration) for AFC Service Providers (AFCSPs).</p> <p>The structure is consistent with the objectives Ofcom sets out for technical competence, enforceable compliance, and minimising administrative burden. We also support Ofcom’s intention to leverage, where appropriate, established approaches used in other jurisdictions and work already undertaken by industry bodies (including Wi-Fi Alliance and WInnForum) to support AFC testing and evaluation.</p> <p>Implementation suggestions (non-exhaustive):</p> <ul style="list-style-type: none"> • Use multi-stakeholder industry groups, such as Wireless Innovation Forum and Wi-Fi Alliance to develop standardized test and validation processes, including the test cases and test vectors. This approach was used in the United States and helped make the test process greatly efficient both for AFCSPs and the FCC, by involving incumbent communities to ensure the protection of 6 GHz services according to Ofcom rules in all possible interference scenarios. • Publish the Ofcom test vectors and expected outputs used in the testing and evaluation phase, to improve repeatability across applicants and reduce administrative overhead. • Where requirements align internationally, explicitly allow reuse of prior test artefacts as supporting evidence, while retaining Ofcom’s right to require UK-specific testing where the technical framework differs. • Provide clarity on how applicants should demonstrate compliance for requirements that are not readily testable (e.g., through documented methods and auditability), and how such demonstrations will be assessed.
<p>Question 2: Do you agree with our proposed registration conditions for AFCSPs?</p>	<p>Confidential? – N</p>

Question	Your response
	<p>WInnForum agrees, in principle, with Ofcom’s proposed registration conditions for AFCSPs, including requirements for secure registration/authentication of Standard Power devices; secure access to licensing data; log retention and disclosure to support interference investigations; and the ability to comply with Ofcom enforcement instructions.</p> <p>We particularly support:</p> <ul style="list-style-type: none"> • The requirement that AFCSPs provide service on a fair, reasonable and non-discriminatory basis, which is important for enabling a competitive multi-vendor AFC ecosystem. • Secure handling of both public and confidential licensing information, with clear expectations for information security and audit support. • The requirement for routine refresh of incumbent licence data to ensure ongoing protection of current and future users. <p>Interoperability and technology neutrality:</p> <ul style="list-style-type: none"> • Ofcom’s framework is explicitly technology-neutral (RLAN rather than a specific air interface). WInnForum recommends that Ofcom continue to emphasise technology-neutral functional requirements and interoperable interfaces, to reduce barriers to entry and avoid vendor lock-in. • WInnForum has published baseline standards for AFC functional requirements and device–AFC signalling (e.g., WINNF-TS-1014 and WINNF-TS-3007) and security guidance (WINNF-TR-2012), which may be useful reference material for industry implementation, test planning, and future refinements. <p>Cross-border coordination:</p> <ul style="list-style-type: none"> • WInnForum supports Ofcom’s inclusion of cross-border fixed link protection considerations (including use of relevant Irish licensing information) as part of the AFC calculations.
<p>Question 3: Do you agree with our proposed technical measures set out here and in more detail in Annex A5 to</p>	<p>Confidential? – N</p> <p>WInnForum agrees with Ofcom’s proposed technical measures to protect existing services, as set out in the consultation and in Annex A5, and supports the overall</p>

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<p>protect existing services in the 6 GHz band?</p>	<p>approach of using an AFC system to enable Standard Power licence-exempt use while protecting incumbent services.</p> <p>Key elements we support include:</p> <ul style="list-style-type: none"> • Use of a well-defined, regulator-specified propagation model and inputs (including the proposed use of ITU-R P.452-18 clear-air mechanisms with Ofcom-provided terrain and clutter datasets). • Explicit protection criteria (including co-channel and adjacent channel considerations). • Conditional application of building entry loss only where indoor deployment is confirmed (to improve spectrum availability without compromising enforceable protection). • Clear treatment of “existing services” as including current and future fixed links in the licensing database, and other services that Ofcom may notify to AFCSPs. <p>Implementation suggestions (non-exhaustive):</p> <ul style="list-style-type: none"> • Maintain strict version control for terrain/clutter datasets, clutter-category mappings, and any model parameters used by AFCSPs, with a clear update process and transitional provisions. Version control for these datasets will help ensure testing consistency. To ensure uniform results in the United States, the AFC System test plan, consisting of the “Wi-Fi Alliance AFC System (SUT) Compliance Test Plan” and “WINNF-TS-4007 (WInnForum Extension to AFC System Compliance Test Plans)”, uses specific snapshots of datasets (such as ULS, NLCD, and USGS DEMs) from known dates to validate calculation accuracy during the certification process. • Ensure the framework includes robust handling of missing or invalid registration/licence data (e.g., fail-safe behaviour that defaults to protection). WInnForum has dedicated an entire recommendation document to this issue: WINNF-RC-1010 (“Recommendations for Addressing Blank, Uncollected, Erroneous, or Conflicting Database Elements”). <p>WInnForum has also published work products relevant to propagation, protection criteria, and building entry loss that may be informative as Ofcom finalises and</p>

Question	Your response
	<p>evolves these measures (e.g., WINNF-TR-1002 and WINNF-TR-1011).</p>
<p>Question 4: Do you agree with our proposals for the technical conditions and voluntary national specification to enable licence exempt operation of Wi-Fi devices under the control of an AFC system?</p>	<p>Confidential? – N</p> <p>WInnForum agrees with Ofcom’s proposed technical conditions for licence-exempt operation of Wi-Fi/RLAN devices under AFC control, and with the concept of using a draft Voluntary National Specification (VNS) to bridge the period before harmonised standards fully cover the Upper 6 GHz band.</p> <p>We support the following core device-side requirements:</p> <ul style="list-style-type: none"> • Standard Power access points and fixed client devices operate only from fixed locations, have geolocation capability (including uncertainty at a defined confidence level), and query an Ofcom-registered AFC system prior to operation. • Devices re-contact the AFC system regularly, supporting ongoing protection of current and future protected services. <p>On the VNS:</p> <ul style="list-style-type: none"> • WInnForum encourages Ofcom to continue to treat these requirements as technology-neutral (RLAN rather than a specific technology) and to support interoperable AFC interfaces. WInnForum’s published AFC device–AFC interface work (e.g., WINNF-TS-3007) may be useful as an implementation reference for interoperability. <p>We recommend Ofcom ensure that:</p> <ul style="list-style-type: none"> • The VNS and associated regulations make clear which requirements are mandatory versus guidance, and how compliance will be demonstrated (including test/certification expectations).
<p>Question 5: Do you have any representations to make on the Proposed Regulations: Wireless Telegraphy (Exemption)(Amendment) Regulations 2026?</p>	<p>No comments.</p>

Question	Your response
Question 6: Do you have any representations to make on the Proposed Regulations: Dynamic Spectrum Access Service (Frequencies) Regulations 2026?	No comments.
Question 7: Do you have any comments on our impact assessment (to the extent not covered by previous questions)?	No comments.
Question 8: Do you have any comments on our Equality impact assessment?	No comments.
Question 9: Do you have any comments on our Welsh Language impact assessment?	No comments.
Question 10: Do you have any other comments relating to this consultation?	No comments.

Please tell us how you came across this consultation.

- Email from Ofcom
- Saw it on social media
- Found it on Ofcom's website
- Found it on another website
- Heard about it on TV or radio
- Read about it in a newspaper or magazine
- Heard about it at an event
- Somebody told me or shared it with me
- Other (please specify)

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