IEEE P802.18  
Radio Regulatory Technical Advisory Group (RR-TAG)

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Proposed Response to Japan Ministry of Internal Affairs and Communications (MIC) consultation on WRC-23 | | | | |
| Date: 2022-12-05 | | | | |
| Author(s): | | | | |
| Name | Company | Address | Phone | email |
| Thomas Kürner | TU Braunschweig |  |  | [t.kuerner@tu-bs.de](mailto:t.kuerner@tu-bs.de) |
| Ben Rolfe | Blindcreek Assoc. |  |  | [ben@blindcreek.com](mailto:ben@blindcreek.com) |
| Ryuji Kohno | YNU |  |  | [kohno@ynu.ac.jp](mailto:kohno@ynu.ac.jp) |

This contribution proposed a response to:

Japan Ministry of Internal Affairs and Communications (MIC) consultation “Request for comments on Japan’s positions on the 2023 World Radiocommunication Conference (WRC-23)”

<https://www.soumu.go.jp/menu_news/s-news/01kiban10_02000041.html>

**Notice:** This document has been prepared to assist IEEE 802.18. It is offered as a basis for discussion and is not binding on the contributing individual(s) or organization(s). The material in this document is subject to change in form and content after further study. The contributor(s) reserve(s) the right to add, amend or withdraw material contained herein.

Electronic filing December 5, 2022

Re: Consultation “Request for comments on Japan’s positons on the 2023 World Radiocommunication Conference (WRC-23)”

Dear Japan MIC,

IEEE 802 LAN/MAN Standards Committee (LMSC) thanks Japan Ministry of Internal Affairs and Communications (MIC)for issuing the consultation “Request for comments on Japan’s positions on the 2023 World Radiocommunication Conference (WRC-23)” and the opportunity to provide feedback on this topic. The Consultation is an important mechanism for soliciting feedback that will provide MIC with the information necessary.

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 also produce standards for wired ethernet networks, and technologies produced by implementers of our standards are critical for all networked applications today.

IEEE 802 LMSC 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 400,000 members in over 160 countries. IEEE’s core purpose is to foster technological innovation and excellence for the benefit of humanity. In submitting this document, IEEE 802 LMSC acknowledges and respects that other components of IEEE Organizational Units may have perspectives that differ from, or compete with, those of IEEE 802 LMSC. Therefore, this submission should not be construed as representing the views of IEEE as a whole[[1]](#footnote-1).

Please find below the responses of IEEE 802 LMSC to the agenda items 1.2 and 10.

**Agenda item 1.2 on 6425-7025 MHz and 7025-7125 MHz:**

In the past ten years the IEEE 802 LMSC has overseen the development of many technologies designed for operating in unlicensed bands at high utility and speed.

Key among these is IEEE Std 802.15.6-2012 [1], a standard for short range, wireless communication in the vicinity of, or inside, a human body (but not limited to humans). One of the applications of this standards is medical wireless body area network (BAN). The standards can use existing ISM bands as well as frequency bands approved by national medical and/or regulatory authorities. For the channelization adopted by the standard,

* there is a channel plan number 5 that uses a channel with central frequency 6489.6 MHz and bandwidth 499.2 MHz as a part of the UWB high band, which falls into the 6425-7025 MHz band.
* there is a channel plan number 6 that uses a channel with central frequency 6988.8 MHz and bandwidth 499.2 MHz as a part of the UWB high band, which falls into the 7025-7125 MHz band.

The project P802.15.6ma is a revision of the standard IEEE Std 802.15.6-2012 that intends to update and assist new use cases with enhanced dependability in human and vehicle bodies, while increasing the dependability support by such standard. The project is currently studying a feasible technology for coexistence between the UWB-BAN and other radios overlaid in this band including any primary use of radio.

IEEE 802 LMSC would like to have an opportunity to study technologies in both the 6425-7025 MHz band and the 7025-7125 MHz band, and find a solution for the coexistence between the existing primary operations and the IEEE 802.15.6 technologies.

In addition, standards such as IEEE 802.11ax[2] are already capable of operating in 6 GHz bands, and could, just like the IEEE 802.11ac[3] standard ("5 GHz Wi-Fi") ten years before it come to provide great utilities for end-consumers. IEEE 802 technologies are designed not to cause interference with other users in the band. The Wi-Fi industry even beyond IEEE 802 technical designs are taking the lead in a number of co-existence strategies for bands with alternative incumbent users, such as Automated Frequency Coordination[4]. A new generation of IEEE 802.11 technologies currently under development in the IEEE 802.11be task group will continue to enhance and improve spectrum co-existence capacities, with prior research from for instance the ECC[5] indicating that access to larger, contiguous bandwidths in the 6 GHz band reduces the potential for harmful interference more than alternative solutions.

The IEEE 802 LMSC believes that the world's nations should not identify the 6425-7125 MHz bands with IMT. A premature identification with IMT will lock this spectrum from unlicensed users, and block the operation of technologies in these bands that already exist and are capable of co-existing with primary users in the bands without causing harmful interference. Not identifying the bands with IMT at the WRC-23 does not block the participating decision-makers from making an identification at a later time, should it prove necessary. However, identifying the bands with IMT too early limits both the options for and the number of technology innovators that can remain active in these bands.

**Agenda item 10 on WRC-27:**

In 2017 IEEE 802 has published IEEE Std 802.15.3d-2017 [6] covering the frequency band 252-321 GHz for wireless communication. Currently, IEEE 802 is working on the revision of IEEE Std 802.15.3-2016 [7]. In this revision, all frequencies in the range 275-450 GHz identified for the use by fixed and mobile service are considered. Radiolocation service in the frequency bands 275-450 GHz may complement communications applications, especially in the context of joint communication and sensing. IEEE 802 LMSC does not support the identification of these frequency bands for radiolocation service for primary use and instead suggests to work towards an identification for secondary use or co-primary use at most.

**Conclusion**

IEEE 802 LMSC thanks the Japan MIC for providing this invaluable opportunity to provide this submission and kindly requests Japan MIC to take into account our responses in its decision towards WRC-23.

Respectfully submitted

By: /ss/.

Paul Nikolich

IEEE 802 LAN/MAN Standards Committee Chairman

em: [p.nikolich@ieee.org](mailto:p.nikolich@ieee.org)

References:

[1] IEEE Standard for Local and metropolitan area networks - Part 15.6: Wireless Body Area Networks," in IEEE Std 802.15.6-2012, vol., no., pp.1-271, 29 Feb. 2012, doi: 10.1109/IEEESTD.2012.6161600

[2] "IEEE Standard for Information Technology--Telecommunications and Information Exchange between Systems Local and Metropolitan Area Networks--Specific Requirements Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications Amendment 1: Enhancements for High-Efficiency WLAN," in IEEE Std 802.11ax-2021 (Amendment to IEEE Std 802.11-2020) , vol., no., pp.1-767, 19 May 2021, doi: 10.1109/IEEESTD.2021.9442429.

[3] "IEEE Standard for Information technology-- Telecommunications and information exchange between systemsLocal and metropolitan area networks-- Specific requirements--Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications--Amendment 4: Enhancements for Very High Throughput for Operation in Bands below 6 GHz.," in IEEE Std 802.11ac-2013 (Amendment to IEEE Std 802.11-2012, as amended by IEEE Std 802.11ae-2012, IEEE Std 802.11aa-2012, and IEEE Std 802.11ad-2012) , vol., no., pp.1-425, 18 Dec. 2013, doi: 10.1109/IEEESTD.2013.6687187.

[4] Dynamic Frequency Coalition, Automated Frequency Coordination - an established tool for modern spectrum management, March 2019. [Available online](https://dynamicspectrumalliance.org/wp-content/uploads/2019/03/DSA_DB-Report_Final_03122019.pdf) [accessed: 2022-12-07].

[5] Section 6.2.6 in CEPT ECC Report 302: Sharing and compatibility studies related to Wireless Access Systems including Radio Local Area Networks (WAS/RLAN) in the frequency band 5925-6425 MHz (published 29 May 2019). [Available online](https://docdb.cept.org/document/10170) [accessed: 2022-12-07]

[6] IEEE Standard for High Data Rate Wireless Multi-Media Networks--Amendment 2: 100 Gb/s Wireless Switched Point-to-Point Physical Layer," in IEEE Std 802.15.3d-2017 (Amendment to IEEE Std 802.15.3-2016 as amended by IEEE Std 802.15.3e-2017), vol., no., pp.1-55, 18 Oct. 2017, doi: 10.1109/IEEESTD.2017.8066476.

[7] IEEE Standard for High Data Rate Wireless Multi-Media Networks," in IEEE Std 802.15.3-2016 (Revision of IEEE Std 802.15.3-2003, vol., no., pp.1-510, 25 July 2016, doi: 10.1109/IEEESTD.2016.7524656.

1. This document solely represents the views of IEEE 802 LMSC and does not necessarily represent a position of either the IEEE or the IEEE Standards Association. [↑](#footnote-ref-1)