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

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| Proposed Response to MIC for "Technical conditions necessary for advancement of low-power wireless systems", "Technical conditions for introduction of broadband wireless LAN" and "Technical Conditions for Advanced Use of Wireless LAN Systems" |
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This document drafts a proposed response to the Japan MIC’s consultation “Technical Conditions for Introduction of Broadband Wireless LAN”.

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Electronic filing August 18, 2023

Re: Consultation "**T**echnical conditions necessary for advancement of low-power wireless systems"**,** "Technical conditions for introduction of broadband wireless LAN" and "Technical Conditions for Advanced Use of Wireless LAN Systems"

Dear MIC,

IEEE 802 LAN/MAN Standards Committee (LMSC) thanks Japan Ministry of Internal Affairs and Communications (MIC) for issuing the consultation "Technical conditions necessary for advancement of low-power wireless systems"**,** "Technical conditions for introduction of broadband wireless LAN" and "Technical Conditions for Advanced Use of Wireless LAN Systems" and for the opportunity to provide feedback.

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).

IEEE 802 LMSC follows Japan’s regulatory activities regarding RLAN and supports MIC proceedings on enabling Standard Power (SP) using AFC for spectrum sharing with fixed communication systems operated in 5925 – 7125 MHz and opening 6425 - 7125 MHz for VLP and LPI. We hope that the new regulation will be enacted in a timely manner.

Please find below the IEEE 802 LMSC comments on this consultation focusing on the aspect of the consultation related to the 6GHz band.

**IEEE 802.11be and Wi-Fi 7**

The new generation of IEEE 802.11 technologies, currently under development in the IEEE P802.11be amendment [1], will continue to improve performance and enhance spectrum coexistence capacities. To achieve the targeted performance improvements, and as it was recognized in the consultation, IEEE P802.11be introduces advanced features including channel bandwidths of up to 320 MHz, multiple resource units to a single station, multi-link operation, enhanced quality of service (QoS), improved Target Wake Time, and improved spectrum management to accommodate coexistence with incumbents more effectively and efficiently. Please note that the P802.11be amendment currently supports carrier frequency operation between 1000 MHz and 7125 MHz with extension to 7250 MHz under consideration.

Considering 320MHz channel bandwidth size as one of the key features in IEEE 80211be, we would like to use this opportunity and highlight the importance of availability of multiple 320MHz channels to support scaling of IEEE 802.11be based deployments in environments with multiple simultaneous sessions of high throughput low latency applications such as AR/VR in education or health industries [2] [3]. This highlights importance of MIC extension of 6GHz band and opening of 6425 - 7125 MHz for SP, LPI and VLP modes.

IEEE 802 LMSC applauds MIC progressive approach to adoption of IEEE 802.11be (and Wi-Fi 7 technology) into its technical conditions for advance use of wireless LAN in Japan.

**Client-to-Client Communication under LPI**

IEEE 802 LMSC appreciates MIC leadership in authorizing Client to Client (C2C) communication under LPI mode of operation. With ever-increasing diversity of device types and formfactors, based on IEEE 802.11 set of standards, peer-to-peer communication not only is the most appropriate and efficient for a considerable portion of communication links but also critical to enabling of different Wi-Fi industry segments and business models.

IEEE 802 LMSC supports MIC proposed technical conditions for C2C operation based on the following elements:

1. C2C operation using an LPI enabling signal of -82dBm/20MHz (-95 dBm/MHz) or higher and
2. Recheck interval of 4 sec, on the strength of enabling signal, for portable scenarios when the client device is moving and
3. Allowing Client devices being enabled by different APs to effectively support multi-AP deployments such as enterprise and
4. Allowing C2C links to use different LPI channels and not restricting the C2C communication to the enabling AP operational channel.

IEEE 802 LMSC would like to state that regulatory support for C2C operation in the 6GHz band is already provisioned in the IEEE 802.11ax [4] and Draft P802.11REVme [5].

**Standard Power (SP) in the 6GHz Band**

IEEE 802 LMSC understands that MIC is actively working on proceedings and regulations for authorizing SP operation in the 6GHz band. We also recognize that the incumbent scenarios in Japan are unique and special as the result MIC is currently considering SP operation, under supervision of AFC System, in the two sub-bands 6425 - 6570 MHz and 6870 - 7125 MHz to accommodate presence of ENG incumbent operation in the band. As AFC System certification and deployment in US is making significant progress, we believe that the timing of authorization and enablement of AFC in Japan is perfect. IEEE 802 LMSC respectfully request that MIC to complete the work and authorization of SP mode in the 6GHz band in a timely manner.

**Conclusion**

IEEE 802 LMSC thanks the Japan MIC for the opportunity to provide this submission. IEEE 802 LMSC supports MIC initiative to enable IEEE 802.11be including the 320MHz channel bandwidth sizes and Client to Client operation. We respectfully request MIC to take into account our comments listed in this response.

Respectfully submitted

By: /ss/.

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References:

[1] IEEE Draft 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: Enhancements for Extremely High Throughput (EHT)," in IEEE P802.11be/D3.0, January 2023 , vol., no., pp.1-999, 1 March 2023.

[2] [AR/VR Spectrum Requirement for Wi-Fi 6E and Beyond | IEEE Journals & Magazine | IEEE Xplore](https://ieeexplore.ieee.org/document/9994727)

[3] [Spectrum Needs of Wi-Fi 7](https://ieeexplore.ieee.org/abstract/document/9762843#:~:text=Allocation%20of%20the%201200%20MHz%20of%20contiguous%20spectrum,larger%20channel%20bandwidths%20of%20up%20to%20320%20MHz.), IEEE Communications Standards Magazine, March 2022

[4] “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.

[5] “IEEE P802.11-REVme™/D3.1, Draft 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, July 2023

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)