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| **Radiocommunication Study Groups** |  |
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| Received: Subject: Contribution on Annex 17 to Document 5A/597-E | **Document 5A/xx** |
| **13 – 22 September 2023** |
| **English only** |
| Institute of Electrical and Electronics Engineers |
| IEEE 802’S VIEWS ON Annex 17 to Document 5A/597-E |

**Source Information**

IEEE 802 LAN/MAN Standards Committee (LMSC) respectfully submits this submission to ITU-R Working Party 5A (WP 5A). IEEE 802 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 acknowledges and respects that other components of IEEE Organizational Units may have perspectives that differ from, or compete with, those of IEEE 802. Therefore, this submission should not be construed as representing the views of IEEE as a whole[[1]](#footnote-1).

**Introduction**

This document provides IEEE’s views on [Annex 17](https://www.itu.int/dms_pub/itu-r/md/19/wp5a/c/R19-WP5A-C-0597%21N17%21MSW-E.docx) to [Doc. 5A/597](https://www.itu.int/dms_pub/itu-r/md/19/wp5a/c/R19-WP5A-C-0597%21%21MSW-E.docx), “Working document towards a preliminary draft new Report ITU-R M.[bb-WAS.freq] - Frequencies used by systems based on radio interface standards for broadband wireless access”.

As stated in documents 5A/547 “Proposed modification to Recommendation ITU-R M.1801-2” and 5A/675 “IEEE 802’S VIEWS ON ANNEX 17 TO DOCUMENT 5A/597”, IEEE does not believe that addition of frequency tables to M.1801 is appropriate and does not support that the idea.

**Discussion**

IEEE believes that inclusion of frequency ranges and addition of a frequency table and/or a separate frequency document is out of scope of Recommendation ITU-R M.1801 as it is unnecessary and potentially confusing. Information on operational frequencies of standards included in Recommendation ITU-R M.1801 are generally captured in other ITU-R Reports and Recommendations. More specifically, as far as RLAN technologies are concerned, operational frequencies are already covered in Recommendation ITU-R M.1450 and any duplication of frequency tables in such companion to report to M.1801 is unnecessary, confusing and a potential source of inconsistency.

During the twenty-ninth meeting of WP5A, in contribution 5A/723, Canada proposes to include only a reference to Recommendation ITU-R M.1450 in Annex 1 of Report ITU-R M.[BB-WAS-FREQ], without reproducing the table. While IEEE 802 appreciate Canada’s initiative to address IEEE 802 concern regarding duplication of information, we do not believe this will resolve the issue. More specifically, the following proposed content are not consistent with the current scope of Recommendation M.1450 where the frequency ranges are referenced to.

1. Title of proposed document “Frequencies used by systems based on radio interface standards for broadband wireless access”: referring to “used frequencies” while M.1450 is intended to have a broader scope and specify technology capabilities.
2. Content of Introduction section as referred to “national/regional licensing regulations, device ecosystem and actual deployments”: Device ecosystem and actual deployments are not relevant to scope of M.1450.
3. Content of ANNEX 1 “Recommendation ITU-R M.1450 includes information on frequency ranges and use conditions for RLANs in certain administrations and/or regions.”: is not completely consistent with the intent of M.1450 that is also tasked to cover RLAN technology capabilities including supported frequencies.

IEEE 802 believes that because of the above reasons, creation of such document causes unnecessary confusion and potential inconsistency. Hence, IEEE does not support creation of new Report ITU-R M.[bb-WAS.freq].

**Proposal**

IEEE does not support creation of Report ITU-R M.[bb-WAS.freq] - Frequencies used by systems based on radio interface standards for broadband wireless access” and would like to see this work not pursued in WP5A.

**Contact:** LYNCH Michael **E-mail:** freqmgr@ieee.org

1. This document solely represents the views of the IEEE 802 LAN/MAN Standards Committee and does not necessarily represent a position of either the IEEE, the IEEE Standards Association or IEEE Technical Activities. [↑](#footnote-ref-1)