**IEEE P802.15**

**Wireless Personal Area Networks**

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| Project | IEEE P802.15 Working Group for Wireless Personal Area Networks (WPANs) |
| Title | **LB213/D02 comment resolution -- CIDs 12, 407, 115** |
| Date Submitted | July 1, 2025 |
| Sources | Alex Krebs (Apple)  krebs @ apple.com |
| Re: |  |
| Abstract |  |
| Purpose | To propose resolution for MMS related comments for “P802.15.4ab™/D02 Draft Standard for Low-Rate Wireless Networks”. |
| Notice | This document does not represent the agreed views of the IEEE 802.15 Working Group or IEEE 802.15.4ab Task Group. It represents only the views of the participants listed in the “Sources” field above.It is offered as a basis for discussion and is not binding on the contributing individuals. The material in this document is subject to change in form and content after further study. The contributors reserve the right to add, amend or withdraw material contained herein. |

**Table of contents**

[CID 12, 470, 115 3](#_Toc203417181)

# CID 12, 470, 115

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| **Name** | **Index #** | **Page** | **Sub-clause** | **Line #** | **Comment** | **Proposed Change** |
| Aldana, Carlos | 12 | 83 | 10.39.8.3 | 20 | In Figure 45, if the response is sent within 18us, LBT is not necessary. | Add a packet extension to either the end of the first packet or the beginning of the second packet to reduce the gap to less than 18us. |
| VERSO, BILLY | 470 | 83 | 10.39.8.2 | 16 | This talks about skipping for a ranging round, maybe it should be just "for the current ranging exchange", or might imagine the device later in the ranging round, having some ranging sub-rounds allocatged to range to another device and as this is some ms later it may well be successful. | change to "for the current ranging exchange" |
| KREBS, ALEX | 115 | 83 | 10.39.8.3 | 14 | The European Commission (EC) has announced on Feb 7 2025 that [B1] lacks technology neutrality therefore cannot be used to provide a presumption of conformity for NBFH equipment. Therefore 15.4ab devices following the depicted procedure cannot be used for harmonized spectrum access in Europe. Since the EC approval process typically takes 1 year or longer from the time of submission and no submission of a corrected draft of EN 303 687 after [B1] has made so far and no submission is announced or can be expected within the time scope of TG4ab, the invalid section needs correction. | Replace all content of subsection 10.39.8.3 by: If LBT is required before a transmission, either for regulatory reasons or as a coexistence mechanism, then then one of the channel access methods defined in 6.3.2 or 10.45 with CCA mode 1 or 3 shall be applied by initiator and responder independently in each transmission slot, even if the same channel is used in consecutive slots. If LBT is not required, the same methods may be used to improve coexistence with other spectrum users. |

Discussion: In Commission Implementing Decision (EU) 2025/893 of 14 May 2025 the commission has finally voided EN 303 687 V1.1.1 for presumption of conformity with EU law for all NFBH equipment in a legally binding manner. There is no chance to update this released ETSI standard and instead ETSI will have to work on a new V2.X.X standard to fix the existing issues. Therefore not only the 16us timing is incorrect in this section, but the entire paragraph is specifies an incorrect LBT procedure that will have to be replaced in a future EN 303 687 V2.X.X standard. There is no expectation that ETSI TC BRAN can agree on a new V2.X.X standard and the commission can approve such tbd standard within the 802.15.4ab timeline to completion, therefore the LBT procedure in this paragraph should be updated to reference the 802.15.4 native methods with CCA mode 1 or 3 instead.

Proposed resolution: Revised.

Disposition detail: Instruction to editor: Replace all content of subsection 10.39.8.3 by:

If LBT is required before a transmission, either for regulatory reasons or as a coexistence mechanism, then then one of the channel access methods defined in 6.3.2 or 10.45 with CCA mode 1 or 3 shall be applied by initiator and responder independently in each transmission slot, even if the same channel is used in consecutive slots. If LBT is not required, the same methods may be used to improve coexistence with other spectrum users.