



IEEE 802 LAN/MAN Standards Committee (LMSC)

IEEE 802 LMSC VIEWS ON WRC-19 AGENDA ITEMS

For consideration in APG-19 Working Party 6

Introduction

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 appreciate the opportunity to provide these comments to APT.

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 420,000 members in about 190 countries and supports the needs and interests of engineers and scientists broadly. 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 whole¹.

IEEE 802 LAN/MAN Standards Committee (LMSC) respectfully submits its views for consideration of WRC-19 Agenda Item 10 with regards to TVWS and proposal(s) seeking IMT identification in parts of the 5925-7125 MHz frequency range.

Agenda Item 10, Re: TV White Space

There is an interest from regulators and other stake holders to provide cost-effective broadband connectivity to their masses. Problems are especially severe in Rural Areas.

TV White Space based communications may be used to connect the un-connected due to their favorable propagation characteristics.

The TV White Space eco-system would like to initiate a study at the WRC-23 to investigate if the Radio Regulations can accommodate:

- 54-88 MHz, 172-216 MHz, 470-585 MHz for terrestrial broadcast services with secondary operation by whitespace devices on a non-interfering basis,
- Or Co-primary use of terrestrial TV Broadcast services with whitespace devices.

Agenda Item 10, Re: Proposal Seeking IMT Identification in 6 GHz Band

Mobile Service, Fixed Services and Fixed-Satellite Services have co-primary status in the 6 GHz band (5925-7125 MHz). In many regions, including Region 3 (APT), Fixed-Satellite Service (FSS) earth stations (Earth-to-space direction) in conjunction with commercial Fixed Services are already operational in the band.

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.

As the band already enjoys Mobile allocation by ITU, cellular mobile operation is provisioned and can be administered flexibly regionally or nationally in APT without a need for IMT designation. Any IMT designation may require costly re-farming of the band and relocation of incumbents to other bands. Relocation would also require availability of suitable sub 10 GHz spectrum. Alternatively, using sharing mechanisms, such as Automated Frequency Coordination (AFC), being proposed by U.S. Federal Communication Commission and being evaluated by administrations in other regions, to facilitate co-existence with incumbent Fixed Services.

Extensive efforts are underway in Regions 1 and 2 in 6 GHz bands (5925-7125 MHz) to expand license-exempt device operation. More specifically, the European Commission has issued directives in form of an [EC Mandate](#) to CEPT to conduct the studies for co-existence and harmonized technical conditions for RLAN operation in the band. Please see recently published [ECC Report 302](#) and [draft CEPT Report 73](#). Similarly, U.S. Federal Communication Commission has issued a Notice of Proposed Rule Making for unlicensed use of the 6 GHz Band ([NPRM](#)). The 6 GHz Report and Order is expected to be issued by the end of 2019.

Flexible sharing of the band facilitates growth and innovation globally and across the APT region.

Consideration of an agenda item for WRC-23 for 6 GHz IMT designation, would be counterproductive as it may disrupt advancing growth and innovation globally and across Region 3 and cause unnecessary regulatory burden both at ITU and regionally in APT.

Conclusion

IEEE 802 LMSC appreciates the opportunity to share its view of the WRC-19 agenda items above and hopes that it will provide APT further insight on how to approach them during WRC-19. More specifically, IEEE 802 LMSC does not recommend APT proposing the 6 GHz band to be included as an Agenda Item for WRC-23.