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

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| Proposed Response to EC Consultation on Better Regulation Initative |
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This contribution proposed a response to EU call for contribution on EU position on World Radiocommunication Conference 2023.

r1: editorial corrections in fifth paragraph.

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**Dear EU Commission,**

IEEE 802 LAN/MAN Standards Committee (LMSC) is thankful for the opportunity to express its views on the European Commission's first tentative steps towards coordinate EU member state positions ahead of the Word Radiocommunications Conference 2023.

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 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 shouldnot be construed as representing the views of IEEE as a whole.

In the past ten years, the IEEE 802 LMSC has overseen the development of several standards that operate in the license exempt bands and are capable of providing gigabit through-put (both the IEEE 802.11ac and IEEE 802.11ax provide physical layer through-put capacity at gigabit speeds). These technologies have become an integral part of European citizens' lives, known best as "the 5 GHz network". Next generation technologies utilizing both 5 GHz and 6 GHz bands in order to satisfy new requirements in internet of things or lower latency and jitter requirements for applications such as home video, video conferencing or video gaming are already developed and continue to be improved by our hundreds of standards development contributors.

In light of the important role IEEE 802 technologies play in European network eco-systems and as related to “practical need for EU action”, IEEE would like to highlight the importance of license exempt designation in general and Wireless Access Systems (WAS) including Radio Local Area Networks (RLAN) such as WLAN (IEEE 802.11) and WSN (IEEE 802.15) technologies in realization of gigabit connectivity targets as envisioned in the Commission’s [2030 Digital Compass: the European way for the Digital Decade](https://eur-lex.europa.eu/resource.html?uri=cellar:12e835e2-81af-11eb-9ac9-01aa75ed71a1.0001.02/DOC_1&format=PDF)[1]. The proposal for a decision highlights the role of gigabit connectivity in the European digital transition for which we believe IEEE 802 technologies to be critical, also in supporting and complementing 5G.

IEEE respectfully urges the European Commission to recognize the importance of WAS/RLAN in present member states with the option of not assigning the 6 GHz bands to IMT during the WRC-23. This option would be similar to the Option 2 on the band 6425 -7125 MHz - “No IMT identification” on p. 9 of RSPG22-014 FINAL ("Opinion on the ITU-R World Radiocommunication Conference 2023 [DRAFT]") recently presented by the European Commission Radio Spectrum Policy Group (RSPG)[2]. Such an approach would still leave flexibility to later consider the band for licensed 5G use as an IMT identification is not required for this (as Europe has done for many years in the 3.4-3.8 GHz band). An IMT identification on the contrary would pre-determine the future use of the band to be licenses as was the case for the many other bands that have been identified for IMT in the last 20 years.

**References:**

**[1]** COM(2021) 574 final, 2021/0293(COD)

**[2]** <https://rspg-spectrum.eu/wp-content/uploads/2022/06/RSPG22-014final-Draft_RSPG_Opinion_WRC23.pdf>

Respectfully submitted

By: /ss/.

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