

Dear European Commission,

This response is provided in regards to the “Call for evidence” on the Initiative “World Radiocommunication Conference 2023 – EU position” of 28 June 2022 - 26 July 2022 [1].

IEEE 802 LAN/MAN Standards Committee (LMSC) is thankful for the opportunity to express its views on the European Commission’s steps towards coordinated EU member state positions ahead of the World 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. 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 should not 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 standards (including both IEEE Std. 802.11ac-2014 and IEEE Std. 802.11ax-2021) that operate in license-exempt bands and are capable of providing gigabit throughput, i.e., provide physical layer throughput over 1 Gb/s. These technologies have become an integral part of European citizens' lives, providing the basis of "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 802 would like to highlight the importance of license-exempt designation. Developments in Wireless Access Systems (WAS) including Radio Local Area Networks (RLAN) such as Wireless Local Area Networks (WLAN) (IEEE 802.11) and Wireless Specialty Networks (WSN) (IEEE 802.15) technologies are crucial components in realizing the gigabit connectivity targets envisioned in the Commission’s “2030 Digital Compass: the European way for the Digital Decade” [2]. 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, supporting and complementing 5G. This transition will critically depend on opportunities for European industries and consumers to benefit from emerging technologies like high-precision positioning, object sensing, and many others already under development in IEEE 802.

IEEE 802 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 WRC-23. This option is similar to ‘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) [3]. Such an approach would still leave flexibility to later consider the band for licensed 5G use, as Europe has done for many years in the 3.4-3.8 GHz band, since an IMT identification is not required for this. An IMT identification

on the contrary would pre-determine the future use of the band to be presumed licensed, as was the case for the many other bands that have been identified for IMT in the last 20 years.

References:

- [1] https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13445-World-Radiocommunication-Conference-2023-EU-position_en
- [2] COM/2021/118 final (2030 Digital Compass: the European way for the Digital Decade) <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A52021DC0118>
- [3] https://rspg-spectrum.eu/wp-content/uploads/2022/06/RSPG22-014final-Draft_RSPG_Opinion_WRC23.pdf

Respectfully submitted

By: /ss/.

Paul Nikolich

IEEE 802 LAN/MAN Standards Committee Chairman

em: p.nikolich@ieee.org