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

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Proposed Response to RSPG | | | | |
| Date: 2022-07-20 | | | | |
| Author(s): | | | | |
| Name | Company | Address | Phone | email |
| Amelia Andersdotter | Sky Group |  |  | [amelia.ieee@andersdotter.cc](mailto:amelia.ieee@andersdotter.cc) |
| Hassan Yaghoobi | Intel Corp. |  |  | hassan.yaghoobi@intel.com |

This contribution proposed a response to European Commission RSPG: Public Consultation on the Draft RSPG Opinion on ITU-R World Radiocommunication Conference 2023

**Notice:** This document has been prepared to assist IEEE 802.18. It is offered as a basis for discussion and is not binding on the contributing individual(s) or organization(s). The material in this document is subject to change in form and content after further study. The contributor(s) reserve(s) the right to add, amend or withdraw material contained herein.

Electronic Filing July 26, 2022

**Dear European Commission Radio Spectrum Policy Group,**

This response is provided in regards to the Radio Spectrum Policy Group (RSGP) consultation on its draft "Opinion on the ITU-R World Radiocommunication Conference 2023"[1].

IEEE 802 LAN/MAN Standards Committee (LMSC) is thankful for the opportunity to express its views on the RSPG's draft. [[1]](#footnote-1)

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.

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 will utilize both 5 GHz and 6 GHz bands 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. Further improvements continue to be made to our hundreds of standards development contributors.

In light of the important role IEEE 802 technologies play in European network eco-systems, 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](https://eur-lex.europa.eu/resource.html?uri=cellar:12e835e2-81af-11eb-9ac9-01aa75ed71a1.0001.02/DOC_1&format=PDF)” [2]. Without doubt, current and next generations of Wi-Fi technology based on IEEE Std, 802.11ax-2021 [3] and IEEE 802.11be [4], will play a critical role in achieving “Excellent and secure connectivity for everybody and everywhere in Europe”. The European digital 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.

In its request to open the entire 6 GHz band (5925 – 7125 GHz) the RLAN industry engaged in the most comprehensive study of interference with both satellite services and fixed terrestrial networks it has ever done. As a result, regulators worldwide, agreed that sharing without harm is possible. In case of Europe, the results of these studies are encompassed by \ECC Report 302 [6]. These studies also showed that spreading the RLAN energy across the full 1.2 GHz would reduce even further the interference potential. It is for this reason that we believe that RLAN technology is better suited for sharing with the incumbents in this band than traditional IMT networks.

To support ever increasing demands for wireless connectivity traffic in Europe as well as enterprise/commercial level scaling of performance demanding innovative applications, such as VR/AR, telepresence, e-health, e-education, Industrial IoT, HD and 3D video streaming, is only possible when multiple channels with wide bandwidth of 160 MHz and 320 MHz are available for Wi-Fi. Extending the license exempt operation to the upper 6 GHz band (specifically, 6 425– 7 125 MHz) in Europe will make this possible.

IEEE 802 noted the Commission’s attention to the fact that the band 6 425-7 125 MHz is heavily used by long distance and high-capacity fixed links in Europe supporting critical infrastructure in the continent. IEEE 802 also noted that the Commission is currently contemplating on analyzing and addressing IMT coexistence with FS in a medium-term perspective. IEEE 802 would like to bring to the Commission attention that, while this is still an open issue for IMT, the coexistence of RLAN with FS incumbent services is being addressed effectively (currently in advance stages) in close collaboration between regulators and the industries through utilization of Automated Frequency Coordination (AFC). Wi-Fi Alliance is in last stages of completing compliance recommendations [5] for AFC System in the United States. An AFC based sharing mechanism, or a similar dynamic spectrum access as it is being envisioned in EU for 5 945-6 425 MHz, makes it possible to maintain and even expand the operation of FS systems supporting critical infrastructure in Europe while allowing licensed exempt operation in the band for maximum spectrum utilization.

IEEE 802 wishes to express its hope that the RSPG follows its Option 2 of section 4.1.3, not to identify the 6 GHz bands with IMT during WRC-23. Leaving the bands unassigned for now still leaves flexibility to later consider the band for licensed 5G use, should this be deemed necessary. Indeed, European countries have already done this for many years in the 3.4-3.8 GHz band, since an IMT identification was not made for Region 1 in these bands. 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://rspg-spectrum.eu/wp-content/uploads/2022/06/RSPG22-014final-Draft_RSPG_Opinion_WRC23.pdf>

[2] COM/2021/118 final ([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)) <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A52021DC0118>

[3] IEEE 802.11ax™-2021 IEEE Standard for Information technology—Telecommunications and information exchange between systems. Local and metropolitan area networks—Specific requirements, Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications, Amendment 1: Enhancements for High Efficiency WLAN, February 2021

[4] <https://www.ieee802.org/11/Reports/tgbe_update.htm>

[5] [https://www.wi-fi.org/file/afc-specification-and-test-plans](https://can01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.wi-fi.org%2Ffile%2Fafc-specification-and-test-plans&data=05%7C01%7CMina.Dashti%40ised-isde.gc.ca%7C6ac5c35e15224b56193f08da68ee1ee2%7Cb72ac62f06d54cd5824eee92319a4676%7C0%7C0%7C637937669179696860%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=H%2Be8BQCKqm5qa9psSae8xohjr5G6Tdi7mkr8GXz7l%2BY%3D&reserved=0)

[6] CEPT ECC Report 302:  Sharing and compatibility studies related to Wireless Access Systems including Radio Local Area Networks (WAS/RLAN) in the frequency band 5925-6425 MHz(approved 29 May 2019):   <https://docdb.cept.org/document/10170>

Respectfully submitted

By: /ss/.

Paul Nikolich

IEEE 802 LAN/MAN Standards Committee Chairman

em: [p.nikolich@ieee.org](mailto:p.nikolich@ieee.org)

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