

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

**Proposed Response to Norway Nkom Consultation on Proposals
for Changes To The Free Use Regulations**

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Author(s):

Name	Company	Address	Phone	email
Benjamin Rolfe	Blind Creek Associates, UWB Alliance			Ben.Rolfe@ieee.org
Dries Neirynek	Ultra Radio Ltd, UWB Alliance			dries@uwballiance.org

This contribution proposed a response to Norway Nkom consultation on “proposals for changes to the free use regulations”.

NOTE – Revision 5 (18-22/0120r5) is a PDF version of revision 4 (18-22/0120r4).

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firmapost@nkom.no

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Re: Høring av forslag til endringer i fribruksforskriften

Dear Norway Nkom,

IEEE 802 LAN/MAN Standards Committee (LMSC) thanks Nkom for issuing the consultation and the opportunity to provide feedback on “Public consultation - proposal for regulations on the amendment of the free use regulations”.

IEEE 802 LMSC is a leading consensus-based industry standards body, producing standards for wireless networking devices, including wireless metropolitan area networks (“Wireless MANs”), wireless local area networks (“WLANs”), wireless specialty networks (“WSNs”), 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.

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Comments regarding proposed changes for UWB

The studies in ECC Report 327 show that UWB operates with very low risk of causing interference to other services, due to the extremely low transmit power levels, low activity factors, and other technical characteristics, which support high spectral reuse factors and effective sharing on the spectrum. UWB has proven to be an effective complement to other wireless technologies.

With respect to the proposed updates to the regulations for UWB equipment, IEEE 802 LMSC support that Nkom adopt these changes. Expanding the use of radio determination, position tracking and tracking and data collection using fixed devices in outdoor areas will add great public value. UWB is widely deployed in consumer devices such as smartphones and laptops. This has enabled a large number of use cases with significant value to consumers and significant positive economic impact. Fixed devices work with mobile devices to enhance many of these valuable services. Enhanced indoor operation will improve the robustness of these applications in industrial and crowded environments [1, 2, 3].

IEEE 802 LMSC recommend that Nkom also consider additional changes with respect to vehicular use proposed in the update to ECC Decision (06)04.

Comments regarding proposed changes for RLAN

IEEE 802 LMSC are supportive both of Nkom’s proposal to mirror in national legislation EC’s implementing decision 2022/179/EU (ECC/DEC/(08)04 of 2 July 2021) with respect to use of wireless systems, including WAS/RLAN, in the 5 GHz bands [3].

Conclusion

¹ This document solely represents the views of IEEE 802 LMSC and does not necessarily represent a position of either the IEEE or the IEEE Standards Association.

IEEE 802 LMSC thanks Nkom for providing the opportunity to provide this submission.

Respectfully submitted

By: /ss/.

Paul Nikolich

IEEE 802 LAN/MAN Standards Committee Chairman

em: p.nikolich@ieee.org

References:

- [1] IEEE Std 802.15.4™-2020: IEEE Standard for Low-Rate Wireless Networks. Developed by the LAN/MAN Standards Committee of the IEEE Computer Society, May 2020.
- [2] IEEE Std 802.15.4z-2020: IEEE Standard for Low-Rate Wireless Networks. Amendment 1: Enhanced Ultra Wideband (UWB) Physical Layers (PHYs) and Associated Ranging Techniques. Developed by the LAN/MAN Standards Committee of the IEEE Computer Society, June 2020.
- [3] IEEE 802.15 WSN™ Task Group 4ab (TG4ab) 802.15.4 UWB Next Generation:
<https://www.ieee802.org/15/pub/TG4ab.html>
- [4] 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 Developed by the LAN/MAN Standards Committee of the IEEE Computer Society, IEEE Std 802.11™-2020, December 2020.