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

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| Proposed Response to Malaysia MCMC’s consultation on WRC-23 |
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This contribution proposed a response to:

Malaysia’s Malaysian Communications and Multimedia Commission (MCMC)’s consultation “Public consultation on proposed Malaysia's positions for World Radiocommnication Conference 2023 (WRC-23) agenda items”

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Re: Consultation “Public consultation on proposed Malaysia’s positions for World Radiocommnication Conference 2023 (WRC-23) agenda items”

Dear Chairman,

IEEE 802 LAN/MAN Standards Committee (LMSC) thanks Malaysian Communications and Multimedia Commission (MCMC) for issuing the consultation “Public consultation on proposed Malaysia's positions for World Radiocommnication Conference 2023 (WRC-23) agenda items” and for the opportunity to provide feedback on this topic.

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.

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Please find below the responses of IEEE 802 LMSC to WRC-23 agenda item 1.2.

**WRC-23 agenda item 1.2 on 6425-7025 MHz and 7025-7125 MHz:**

While operation of RLAN devices such as those based upon IEEE Std 802.11 are not currently permitted in the 6425 MHz to 7025 MHz and 7025 MHz to 7125 MHz bands in Malaysia, such use is permitted in many other regions of the world including the USA, Canada, Latin America, the Kingdom of Saudi Arabia and the Republic of Korea. The IEEE 802 LMSC believes that the Radio Regulations should retain the current status (“No Change”) of the 6425 MHz to 7025 MHz and 7025 MHz to 7125 MHz bands, and not adopt an IMT identification in these bands. There are currently IEEE 802 LMSC technologies based upon IEEE Std 802.15.4 UWB used in these bands that are widely deployed in high value applications. The “No Change” position, for now, provides a flexibility for MCMC to consider the bands for licensed 5G use in future, should this be deemed necessary, as well as for use by RLAN like devices as is already permitted in many regions of the world. However, identifying the bands for IMT pre-maturely limits the options for these bands. It is because an IMT identification 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.

*IEEE 802.11-based devices operating in the 6 GHz band*

The IEEE Std 802.11ax-2021 [1] standard supports operation in the 6425 MHz to 7025 MHz and 7025 MHz to 7125 MHz bands, and products based on this standard are seeing significant adoption where regulatory rules permit deployment [2]. IEEE 802 technologies are designed to not cause interference with other users in these bands. The Wi-Fi industry is taking the lead in specifying a number of co-existence strategies for bands with incumbent users, such as automated frequency coordination [3][12]. A new generation of IEEE 802.11 technologies, currently under development in the IEEE P802.11be amendment, will continue to enhance and improve even more effective spectrum sharing in these bands. Prior research from the ECC [4] indicates that access to larger, contiguous bandwidths in the 6 GHz band reduces the potential for harmful interference.

Significant economic value is provided by IEEE 802.11 based systems today [5]. Availability of the full 6 GHz band (i.e., 5925 MHz to 7125 MHz) for unlicensed use enables deployment of new applications and services in the coming years, further increasing the societal benefits. The very recent analysis from the UK Ofcom highlights such benefits arising from a “No Change” position [6].

*IEEE 802.15-based devices operating in the 6 GHz band*

IEEE 802.15 standards specify Ultra-Wideband technology operation, which is widely adopted for numerous short-range sensing and ranging applications. Adoption of UWB is growing rapidly, providing both economic growth and valuable new applications. IEEE Std 802.15.4-2020 [7] and IEEE Std 802.15.4z-2020 [8] are standards for communication and precision ranging that are already capable of using both the 6425 MHz to 7025 MHz and 7025 MHz to 7125 MHz bands and are increasingly used in many high value applications. IEEE Std 802.15.6-2012 [9], a standard for short range, wireless communication in the vicinity of, or inside, a human body (but not limited to humans) uses the same bands and channels and is approved by national medical and/or regulatory authorities for applications including medical wireless body area network (BAN).

It is expected that an increasing number of IEEE 802.15.4-2020, IEEE 802.15.4z-2020, and IEEE 802.15.6-2012 devices will continue to be operated in these bands. Notably, with the increasing use of IEEE 802.15 devices in the smartphone and consumer automotive spaces, it is forecasted that more than 1 billion UWB-enabled devices will be shipped annually worldwide by 2025 [10].

It can be noted that operation of UWB based on 802 standards is currently permitted in Malaysia and world-wide has proven to be compatible with existing licensed operations in the subject bands. Introduction of new, much higher powered services such as IMT may be considerably more disruptive.

**Conclusion**

IEEE 802 LMSC thanks MCMC for the opportunity to provide this submission and kindly requests to take into account our opinions in its decision towards WRC-23.

Respectfully submitted

By: /ss/.

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References:

[1] “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,” in *IEEE Std 802.11ax-2021 (Amendment to IEEE Std 802.11-2020)*, vol., no., pp.1-767, 19 May 2021, doi: 10.1109/IEEESTD.2021.9442429.

[2] Wi-Fi Alliance: Wi-Fi 6E momentum underscores need for entire 6 GHz band, November 2022. [Available online](https://www.wi-fi.org/news-events/newsroom/wi-fi-6e-momentum-underscores-need-for-entire-6-ghz-band), [accessed: 25 July 2023].

[3] Dynamic frequency coalition: Automated frequency coordination - an established tool for modern spectrum management, March 2019. [Available online](https://dynamicspectrumalliance.org/wp-content/uploads/2019/03/DSA_DB-Report_Final_03122019.pdf) [accessed: 25 July 2023].

[4] CEPT: Section 6.2.6, 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, May 2019. [Available online](https://docdb.cept.org/document/10170) [accessed: 25 July 2023]

[5] Wi-Fi Alliance: Value of Wi-Fi. [Available online](https://www.wi-fi.org/discover-wi-fi/value-of-wi-fi) [accessed: 25 July 2023]

[6] UK Ofcom: Update on the upper 6 GHz band. [Available online](https://www.ofcom.org.uk/__data/assets/pdf_file/0028/248770/update-on-upper-6hz-band.pdf) [accessed: 25 July 2023]

[7] “IEEE Standard for Low-Rate Wireless Networks,” in *IEEE Std 802.15.4-2020* (Revision of IEEE Std 802.15.4-2015), vol., no., pp.1-800, 23 July 2020, doi: 10.1109/IEEESTD.2020.9144691.

[8] “IEEE Standard for Low-Rate Wireless Networks--Amendment 1: Enhanced Ultra Wideband (UWB) Physical Layers (PHYs) and Associated Ranging Techniques,” in *IEEE Std 802.15.4z-2020* (Amendment to IEEE Std 802.15.4-2020), vol., no., pp.1-174, 25 Aug. 2020, doi: 10.1109/IEEESTD.2020.9179124.

[9] “IEEE Standard for Local and metropolitan area networks - Part 15.6: Wireless Body Area Networks,” in IEEE Std 802.15.6-2012, vol., no., pp.1-271, 29 Feb. 2012, doi: 10.1109/IEEESTD.2012.6161600.

[10] FiRa Consortium: Unleashing the Potential of UWB: Regulatory considerations, August 2022. [Available online](https://www.firaconsortium.org/sites/default/files/2022-08/Unleashing-the-Potential-of-UWB-Regulatory-Considerations.pdf) [accessed: 25 July 2023]

[11] “IEEE Standard for High Data Rate Wireless Multi-Media Networks,” in *IEEE Std 802.15.3-2016*, vol., no., pp.1-510, 25 July 2016, doi: 10.1109/IEEESTD.2016.7524656.

[12] Intel: Spectrum Sharing Using Automated Frequency Coordination, [Available online](https://www.intel.com/content/dam/www/central-libraries/us/en/documents/2022-12/spectrum-sharing-auto-frequency-coord-whitepaper.pdf) [25 July 2023]

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. [↑](#footnote-ref-1)