

Re: Consultation on the proposed abolition of two normative documents re: 40-50 GHz band

Dear Telecommunications Bureau,

IEEE 802 LAN/MAN Standards Committee (LMSC) thanks the Ministry of Industry and Information Technology (MIIT) of the People's Republic of China for issuing the consultation that call for comments on the proposed abolition of the two normative documents, namely Circular No. 2013 No. 500 "Ministry of Industry and Information Technology's Issues Regarding Frequency Use of Point-to-Point Wireless Access Systems in Fixed Services in the 40-50 Gigahertz (GHz) Band" and Circular No. 2013 No. 502 "Notice of the Ministry of Industry and Information Technology on Publishing Matters concerning Frequency Use of Broadband Wireless Access Systems in Mobile Services in the 40-50 Gigahertz (GHz) Band".

IEEE 802 LAN/MAN Standards Committee (IEEE 802 LMSC) is a leading consensus-based open standards development committee for networking standards that are used by industry globally. It produces standards for networking devices, including wired and wireless local area networks ("LANs" and "WLANs"), wireless specialty networks ("WSNs"), wireless metropolitan area networks ("Wireless MANs"), and wireless regional area networks ("WRANs"). Technologies produced by implementers of our standards are a critical element for all networked applications today.

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Please find below the IEEE 802 LMSC's specific comments on the proposed abolition of the following normative document, Circular No. 2013 No. 502 "Notice of the Ministry of Industry and Information Technology on Publishing Matters concerning Frequency Use of Broadband Wireless Access Systems in Mobile Services in the 40-50 Gigahertz (GHz) Band".

IEEE 802.11 devices operating in the 40 GHz to 50 GHz band

The IEEE Std 802.11aj-2018 standard [1] support frequency operation in the 42.3 GHz to 47 GHz and 47.2 GHz to 48.4 GHz frequency bands. The channelization of IEEE 802.11aj includes 10 channels with a bandwidth of 540 MHz each and 5 channels with a bandwidth of 1080 MHz each. In China's densely populated cities, and with the ubiquitous use of mobile devices, IEEE 802.11aj provides a robust solution to mitigate device interference, lowering instantaneous power requirements and increasing coverage, especially for small form-factor, battery-powered devices

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.

with small antennas. It also promotes the development of related technologies and applications that leverage spectrum uniquely available in China.

In November 2023, an IEEE 802.11 study group dedicated to the enhanced specification of millimeter Wave operation for WLAN connectivity will begin work, with the target of specifying frequency operation between 42.5 GHz and 71 GHz and defining integration with the multi-link operation framework specified by IEEE P802.11be [2]. The 40 GHz to 50 GHz bands will therefore be of continued relevance for the WLAN ecosystem.

The normative document should be retained

IEEE 802 LMSC believes that the MIIT should retain the normative document to support the use of broadband wireless access systems in mobile services, including radio local area network (RLAN), in the 40 GHz and 50 GHz band. Retaining the document strengthen the MIIT's goals to improve spectrum utilization and further the development of telecommunications industry ecosystem.

Conclusion

IEEE 802 LMSC thanks the MIIT for the opportunity to provide this submission and kindly requests MIIT to consider our responses in its future decisions regarding the use of broadband wireless access systems in mobile services in the 40 GHz and 50 GHz band.

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 3: Enhancements for Very High Throughput to Support Chinese Millimeter Wave Frequency Bands (60 GHz and 45 GHz)," in IEEE Std 802.11aj-2018 (Amendment to IEEE Std 802.11-2016 as amended by IEEE Std 802.11ai-2016 and IEEE Std 802.11ah-2016), vol., no., pp.1-306, 18 April 2018, doi: 10.1109/IEEESTD.2018.8345727.
- [2] "IEEE Draft 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: Enhancements for Extremely High Throughput (EHT)," in IEEE P802.11be/D3.0, January 2023, vol., no., pp.1-999, 1 March 2023.