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

Proposed response to Oman TRA's consultation on UWB regulation

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This document drafts a proposed response to Oman Telecommunications Regulatory Authority (TRA)'s consultation "Public Consultations on the Draft Regulation for the Ultra-Wide Band Technology".

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5 Electronic filing

September 2, 2024

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7 Re: Public Consultations on the Draft Regulation for the Ultra-Wide Band Technology

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9 Dear Executive President,

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11 IEEE 802 LAN/MAN Standards Committee (LMSC) thanks the Telecommunications Regulatory
12 Authority (TRA) for issuing a consultation “Draft Regulation for the Ultra-Wide Band
13 Technology” and for the opportunity to provide feedback on this important topic.

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

22
23 IEEE 802 LMSC is a committee of the IEEE Standards Association and of Technical Activities,
24 two of the Major Organizational Units of the IEEE. IEEE has about 400,000 members in over 160
25 countries and its core purpose is to foster technological innovation and excellence for the benefit
26 of humanity. IEEE is also a major accredited standards development organization whose standards
27 are recognized worldwide. In submitting this document, IEEE 802 LMSC acknowledges and
28 respects that other components of IEEE Organizational Units may have perspectives that differ
29 from, or compete with, those of IEEE 802 LMSC. Therefore, this submission should not be
30 construed as representing the views of IEEE as a whole¹.

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32 Please find below the IEEE 802 LMSC’s comments on this consultation.

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34 Ultra-Wide Band (UWB) devices, as specified in IEEE 802.15 standards, are being used
35 worldwide for a wide range of applications in communication, measurement, location, imaging,
36 surveillance, and medical systems², often in conjunction with other short range device
37 technologies. UWB enhances the operation of such technologies and is an efficient means to share
38 spectrum.

39
40 The next generation of UWB technology, being developed under IEEE P802.15.4ab³, builds on
41 IEEE Std 802.15.4z-2020⁴. Future developments supported by this project include:

- 42 · Improved link budget and reduced air-time
- 43 · Enhanced sensing capabilities for presence detection and environment mapping
- 44 · Improved accuracy, precision, and reliability for high-integrity ranging

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 or the IEEE Technical Activities.

² See FiRa Consortium: Unleashing the Potential of UWB: Regulatory considerations, August 2022, <https://www.firaconsortium.org/sites/default/files/2022-08/Unleashing-the-Potential-of-UWB-Regulatory-Considerations.pdf> [accessed: 22 August 2024]. The introduction of IEEE 802.15 UWB-enabled devices in smartphones and laptops puts forecasts at more than 1 billion devices shipped annually worldwide by 2025.

³ See IEEE P802.15.4ab, <https://www.ieee802.org/15/pub/TG4ab.html> [accessed: 30 August 2024].

⁴ “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.

- 45 · The use of interference mitigation techniques to support greater device density and higher
- 46 traffic use cases
- 47 · Improved coexistence with other services
- 48 · Reduced complexity and power consumption
- 49 · Enhanced support for ultra-low power, low latency streaming
- 50 · Support for emerging applications such as high-definition audio

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52 IEEE 802 LMSC commends TRA for recognizing the rapidly growing value of UWB. Use of
53 extremely low power UWB devices in accordance with ECC Decision (06)04⁵ and the ETSI EN
54 302 065 series of standards harmonizes with worldwide regions, creates further economies of
55 scale, and supports a robust equipment market, benefitting Oman's businesses, consumers, as well
56 as increasing the societal benefits.

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58 We would like to inform the TRA that the reference to ETSI EN 302 500-1 in Article 2(6) of the
59 regulation can be removed. ETSI EN 302 500-1, which previously covered UWB location tracking
60 systems, has now been incorporated into the ETSI EN 302 065 series of standards harmonized for
61 UWB devices. Specifically, the relevant requirements are now covered in ETSI EN 302 065-2⁶
62 for UWB location tracking devices. As such, the separate reference to ETSI EN 302 500-1 is no
63 longer necessary, as compliance with the appropriate part of ETSI EN 302 065 sufficiently covers
64 the relevant technical requirements for UWB location tracking systems. We recommend updating
65 Article 2(6) to refer only to the ETSI EN 302 065 series of standards, which comprehensively
66 covers the various types of UWB devices and applications.

67

68 **Conclusion**

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70 IEEE 802 LMSC thanks TRA for the opportunity to provide this submission and respectfully
71 requests to consider updating Article 2(6) to refer only to the ETSI EN 302 065 series of standards.

72

73 Respectfully submitted

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75 By: /ss/.

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⁵ ECC Decision (06)04, The harmonised use, exemption from individual licensing and free circulation of devices using Ultra-Wideband (UWB) technology in bands below 10.6 GHz, approved 24 March 2006, as amended 18 November 2022.

⁶ ETSI EN 302 065-2 V2.1.1 (2016-11): Short Range Devices (SRD) using Ultra Wide Band technology (UWB); Harmonised Standard covering the essential requirements of article 3.2 of the Directive 2014/53/EU; Part 2: Requirements for UWB location tracking.