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Feedback on the Public Consultation on the Draft RSPG Opinion on ITU-R World Radiocommunication Conference 2023

AVM is one of Europe's leading manufacturers of products for broadband connections and the digital home. FRITZ! brand products are easy to use for everyone. They enable fast internet access, easy networking, convenient telephony and versatile Smart Home applications. The FRITZ!OS software regularly offers new features and keeps all FRITZ! products up-to-date and secure.

Executive Summary

We welcome the opportunity to respond to the Radio Spectrum Policy Group's opinion on the ITU-R World Radiocommunication Conference 2023 (WRC-23). This input focuses on the WRC-23 Agenda Item 1.2 for the 6425-7125 MHz band.

We respectfully plead for the Radio Spectrum Policy Group to recommend its Option 2 on the band 6 425 - 7 125 MHz - "No IMT identification".

In the following, we justify our positioning in more detail.

Wi-Fi is integral to Europe's connectivity objectives

Wi-Fi is at the heart of our increasingly digital economy. There are more than 18 billion Wi-Fi devices in use worldwide. Approximately 92% of fixed broadband traffic in Europe is relayed via Wi-Fi, according to ASSIA[1].

In 2021, 95% of internet traffic in Germany was transmitted over fixed networks and just 5% over mobile networks, according to a report by regulator BNetzA[2]. These numbers show that the absolute volume of Wi-Fi traffic is far greater than that handled by cellular technologies. In Germany, at least, the breakdown by technology is approximately 88% Wi-Fi, 7% Ethernet and 5% cellular.

As fibre networks expand, Wi-Fi will likely carry an even higher proportion of traffic. The FTTH Council Europe[3] anticipates that full fibre connectivity will cover 309 million homes by 2027 in the EU39, up from 217 million in 2022. It notes that fibre is increasingly being deployed in less densely populated areas. Some of these fibre networks will be capable of delivering 10 Gbps to a building in both the uplink and the downlink[4]. Wi-Fi enables this bandwidth to be easily shared by multiple users simultaneously.

UK regulator Ofcom has forecast that Wi-Fi demand in residential environments could grow between six and ten times between 2020 and 2030 driven by increases in video quality and the adoption of virtual reality

[1] Source: the ASSIA "State of Wi-Fi" report, http://dynamicspectrumalliance.org/wp-content/uploads/2021/06/ASSIADSA-Summit-Presentation-v7.8.pdf
[2] Source: Tätigkeitsberichte Telekommunikation, https://www.bundesnetzagentur.de/SharedDocs/Mediathek/Berichte/2021/TTB2020.pdf
[3] FTTH Forecast for EUROPE - Market forecast 2022-2027, FTTH Council Europe, https://www.ftthcouncil.eu/knowledge-centre/all-publications-and-assets/1462/ftth-market-forecasts-2022-2027
[4] For example, Virgin Media O2 plans to bring 10 Gbps fibre connections to more than 14 million homes in the UK. https://news.virginmediao2.co.uk/virgin-media-o2-bolsters-future-network-with-fibre-upgrade-plan/

devices. In public venues, such as arenas or concert halls, demand could increase by up to 15 times over the same period.[5]

The economic benefits are vast and growing. A study by Telecom Advisory Services found that Wi- Fi added over €406 billion to the EU economy in 2021, a number it expects to grow to €565 billion by 2025.[6]

In light of the above, the European Commission's decision to enable Wi-Fi access to the 5945-6425 MHz band (lower 6 GHz band) is a very welcome development.[7] That decision has partially mitigated the spectrum shortfall facing Wi-Fi, but access to the remaining 6 GHz (6425-7125 MHz band, known as the upper 6 GHz band) is urgently needed to enable Europeans to take full advantage of the advanced Wi-Fi connectivity available today. Access to the full 6 GHz band is also critical for future-proofing Wi-Fi connectivity, noting that Wi-Fi 7 will be able to support multiple 320 MHz channel bandwidths.

Countries representing 30% of the world's GDP have opened the entire 6 GHz band for Wi-Fi. As a result, the number of Wi-Fi 6E[8] devices that work across this spectrum is growing rapidly. Research firm IDC anticipates that more than 350 million Wi-Fi 6E products will enter the market in 2022[9].

Wi-Fi 6E can support various demanding use cases, such as ultra HD video streaming, smart home automation, hotspot access, automation of city-wide services, augmented/virtual/ extended reality (AR/VR/XR) applications, health monitoring, wearables, and seamless roaming. Moreover, Wi-Fi 6 is the only cost-effective option to distribute gigabit connectivity within schools and hospitals for eEducation and eHealth services.

Opening new spectrum for Wi-Fi will enable European governments to show that push to deploy in fibre can actual deliver measurable and future-proof benefits to citizens. Adding advanced Wi-Fi technology to the end of fibre deployments will help close the loop between government planning and benefits to citizens and governments.

Wi-Fi 6E, and the forthcoming Wi-Fi 7 standard, need access to the entire 1200 MHz to utilise the full extent of their capabilities and support evolving and emerging innovative use cases, now and in the future. Opening only 480/500 MHz in the lower 6 GHz band would mean that Wi-Fi networks in dense deployments would have to continue employing small channel bandwidths, as only one 320 MHz channel or three 160 MHz channels would be available. With access to 1200 MHz, more of these wide channels could be accommodated, significantly improving the performance available to each user. For more detail, see the Intel report *Spectrum needs of Wi-Fi 7*.[10]

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[5] See UK Ofcom Improving Spectrum Access for Wi-Fi, July 2020, at 3.24, available at https://www.ofcom.org.uk/__data/assets/pdf_file/0036/198927/6ghz-statement.pdf

[6] Discover Wi-Fi: Value of Wi-Fi, Wi-Fi Alliance, https://www.wi-fi.org/discover-wi-fi/value-of-wi-fi

[7] Commission Implementing Decision of 17.6.2021 on the harmonised use of radio spectrum in the 5 945-6 425 MHz frequency band for the implementation of wireless access systems including radio local area networks (WAS/RLANs), available at: https://digital-strategy.ec.europa.eu/en/library/6ghz-harmonisation-decision-more-spectrum-available-betterand-faster-wi-fi

[8] Wi-Fi 6E refers to Wi-Fi 6 operating in the 6 GHz band.

[9] IDC Research, January 2022.

[10] https://www.intel.com/content/www/us/en/wireless-network/spectrum-needs-of-wi-fi-7.html (last visited 15 July 2022).

Wi-Fi provides affordable connectivity to close the digital divide

As noted in the European Commission's *2030 Digital Compass: the European way for the Digital Decade*, a new digital divide has emerged between those who can fully benefit from an enriched, accessible and secure digital space with a full range of services and those who cannot. The European vision for 2030 is a digital society where no one is left behind.

As users do not need to pay licence fees to use the spectrum, Wi-Fi is one of the most cost-effective ways to provide connectivity. Wi-Fi also enables multiple people to share a single broadband connection, reducing the cost of connectivity for each individual. As the Wi-Fi 6E market grows, economies of scale are realised, ensuring that the technology will be highly affordable, like its predecessors.

Many regulators believe withholding the upper 700 MHz of the 6 GHz band would damage this dynamic. ISED in Canada said such a move would "hinder access to affordable broadband services for Canadians in rural and urban areas and would negatively impact the opportunities for innovation."

Reserving a portion of the 6 GHz band for a later decision on whether to allow IMT (or not) would forego the immediate economic gains that would have accrued from opening the entire 6 GHz band to licence-exempt operations. In an August 2020 report[11], Coleago Consulting estimated that 5G would not be deployed in the 6 GHz band for at least a decade. In a subsequent report[12] published in July 2022, the GSMA calls for the 6 GHz spectrum to be available for 5G by 2030. Between now and then, the global economy would forego the vast economic value that Wi-Fi 6E would generate.

If the entire 6 GHz band is made licence-exempt, it could be used by a variety of wireless technologies to provide high-speed Internet access to buildings that have not yet been reached by fibre networks. Community Wi-Fi networks, for example, are widely used to bring Internet access to multiple households. This flexibility would be lost if the spectrum were to be licensed to a small number of MNOs for IMT services alone.

Enabling Europe to shift towards sustainability

Digital technologies, including Wi-Fi, will play a pivotal role in achieving the objectives of the European Green Deal. Connectivity can be used to curb greenhouse gas emissions, as well as humans' broader impact on the environment.

At a more fundamental level, digital connectivity can also reduce travelling, enabling people to fulfil tasks and conduct meetings remotely, rather than driving or flying. As it can deliver high-speed and very responsive connectivity, Wi-Fi 6E is also well suited to delivering VR/AR services that can help people interact effectively without being physically present in the same location. VR/AR is increasingly used for training and education and to help field engineers make repairs or install new equipment. Most of these applications will be used indoors, where Wi-Fi is the technology of choice. In outdoor scenarios, Wi-Fi will

[11] See section 7.3 of the report: The 6 GHz Opportunity for IMT, which says "recognizing the 10+ year timeframe anticipated for 5G at 6 GHz".
[12] 6 GHz in the 5G Era, see Page 5

be widely used to connect smartphones to VR/AR headsets.

In cases where travel is necessary, Wi-Fi can help make public transport more appealing, thereby reducing congestion and emissions caused by private cars. Wi-Fi can make travel time more enjoyable and productive for passengers by providing onboard connectivity on trains, buses, trams, and stations. Wi-Fi connectivity is now a standard feature on board trains in developed markets.

At the same time, Wi-Fi is becoming more efficient, thanks to new features, such as target wake time and the OFDMA radio interface, which reduce power consumption. Most Wi-Fi networks operate at much lower power levels than cellular systems, so they could be the most energy-efficient connectivity option in many scenarios.

Indeed, the French regulator ARCEP[13] found that the combination of fibre and Wi-Fi is the most efficient solution in terms of energy consumption, performance, and flexibility. Energy efficiency will be particularly important in the light of the emerging energy crisis caused by the conflict in the Ukraine, while also helping the EU to achieve its sustainability targets. Employing Wi-Fi, rather than IMT, in the 6 GHz band will require less power, helping Europe to make better use of scarce energy resources.

The ITU has forecast[14] that the energy used by mobile networks around the globe will emit 73.0 Mt CO2 equivalent (CO2e) in 2025, compared with 35.2 Mt CO2e for fixed networks. Considering the share of mobile data and fixed broadband lines in Europe, around 4.8 Mt CO2e will be emitted from fixed networks and 10 Mt CO2e from mobile networks in the EU. That suggests fixed networks produce less than half the CO2e of mobile networks, even though they transport more than ten times the amount of data.

Furthermore, Wi-Fi 6 introduces new features to support IoT deployments, such as support for large numbers of simultaneous connections. As a result, more IoT devices will be able to send more information and use less power.

5G already has access to sufficient spectrum

Successive WRCs have identified specific frequency bands for the deployment of IMT systems, and this spectrum constitutes a good mix of 'coverage' bands (below 5 GHz) and capacity bands (mmWave spectrum above 24 GHz). In Europe, 1018.5 MHz of low and mid-band spectrum can be used by Wi-Fi, whilst 1368 MHz is allocated for IMT services. In Europe, CEPT has already made all the IMT mid-bands technology neutral, allowing the use of this spectrum for 5G.

However, as of 31 August 2021, only 56% of the EU harmonised radio spectrum for 5G had been awarded across the Member States[15]. For the bands below 6 GHz, about 19% of spectrum still needed to be assigned. The large amount of spectrum below 5 GHz that has already been identified for IMT could, and should be, harnessed to improve coverage before specifically identifying more spectrum for IMT. For example, the 3.8-

[13] https://en.arcep.fr/uploads/tx_gspublication/achieving-digital-sustainability-report-dec2020.pdf
[14] Source: ITU, Greenhouse gas emissions trajectories for the information and communication technology sector compatible with the UNFCCC Paris Agreement, 2020.
[15] The bands are 700 MHz, 800 MHz, 900 MHz, 1.5 GHz, 1.8 GHz, 2 GHz, 2.6 GHz, 3.4-3.6 GHz, 3.6-3.8 GHz, and 26 GHz. Source Digital Economy and Society Index (DESI) 2021.

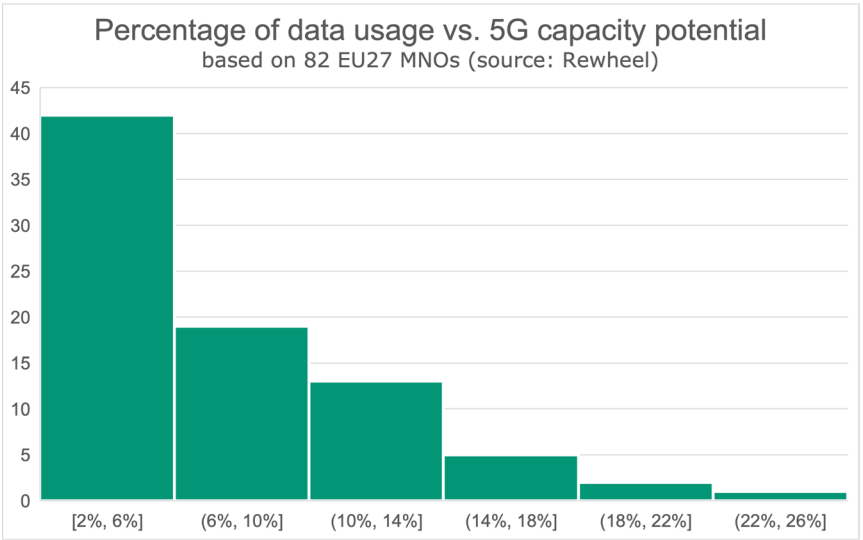
4.2 GHz band should provide ample capacity for 5G to cover the use cases that need licensing.

Although the U.S. has made the entire 6 GHz band licence-exempt, the mobile operators there have plenty of spectrum to meet demand for 5G. For example, leading US telecoms operator Verizon is seeing strong growth in 5G fixed wireless access connections in the C-band (3.7–4.2 GHz). In July 2022, Hans Vestberg, Chairman and CEO of Verizon Communications, told analysts on an earnings call[16]: "The capacity in the network is there, there's no problem. … we have deployed 60 MHz of the C-Band. We have, in average, 160. So, we have so much more to go."

Furthermore, most countries in the EMEA region are considering making the 3300- 3400 MHz, 3800-4200 MHz and 4800-4990 MHz bands available for licensed spectrum use.

Mobile network operators (MNOs) greatly benefit from Wi-Fi's capacity to offload traffic from cellular mobile devices; if this capacity were not available, IMT/5G networks would be more costly, as mobile operators would need to deploy many more small cells in dense urban areas to offer gigabit throughput and provide adequate quality of service, and this would be to mobile users only. Because of the attenuation of signals from outdoor 5G base stations (building entry loss), 5G indoor coverage and performance would be severely limited. Providing 5G gigabit connectivity indoors would require deploying entirely new infrastructure parallel to the existing Wi-Fi one, which will be prohibitive from both a commercial and an environmental point of view.

Today, Europe's 5G networks are operating well below capacity. A study of mobile data usage in 2021 found that, even in the top 5% of the busiest sectors, 5G traffic runs at only 7.7% of capacity on average[17]. In other words, usage of 5G to date tends to show that additional mid-band spectrum is not required.



Mobile operators would be very unlikely to use spectrum in the 6 GHz band nationwide. Given the

[16] https://www.verizon.com/about/investors/quarterly-reports/2q-2022-earnings-conference-call-webcast

[17] Analysis based on the 82 5G networks considered in EU27 by Rewheel research's study "Mobile data usage in 2021 and 4G & 5G operator capacity potential", published in March 2022.
https://research.rewheel.fi/downloads/Mobile_data_usage_2021_capacity_potential_170_operators_50_countries_PUBLIC_VERSION.pdf

characteristics of the upper 6 GHz band, the spectrum would likely be used by MNOs to provide additional outdoor coverage in dense urban and, to a lesser extent, suburban areas - locations with extensive deployments of FTTH. Regardless of whether 5G has access to the 6 GHz spectrum, these fibre networks, together with Wi-Fi, will be used to provide indoor coverage – employing outdoor IMT base stations for this purpose is not technically or economically feasible.

More broadly, with public wide area networks, the requirement to synchronise networks makes it impossible to avoid interference and have flexible networks. An operator that attempts to offer very low latency would have to create interference to other operators or to its network unless every network nationally operates at very low latency, which is not efficient for macro-cells. The configuration of a nationwide network results from compromises between coverage, capacity, latency and the cost of the network.

Demanding industrial applications, such as factory robots and sensors, augmented reality (AR), healthcare monitors, and wireless medical equipment, can be realised with licence-exempt technologies, specifically with Wi-Fi 6E and Wi-Fi 7. Unlike previous generations of Wi-Fi, Wi-Fi 6/6E and Wi-Fi 7 are based on OFDMA technology and can achieve very high quality of service (QoS) levels, particularly in managed networks run by enterprises.

There are various other QoS-enhancing mechanisms and features, particularly in Wi-Fi 7, such as multi-link operation that will improve throughput by aggregating links, enhance reliability by transmitting multiple copies of the same frame in separated links, decrease channel access delay by selecting the first available link in terms of latency, and enable isolation of time-sensitive traffic from other network traffic.

To use spectrum most efficiently, applications necessitating a licensed regime could instead utilize the 3.8-4.2 GHz band, which was made available for use by private and local networks and is already supported by 5G NR.

A common EU position on WRC-23 Agenda Item 1.2 (6425-7125 MHz)

The Commission Implementing Decision (EU) 2021/1067 of 17 June 2021 established the regulatory conditions necessary for operation in the 5945-6425 MHz frequency band. The decision was taken following extensive technical studies which determined that low-power indoor and very low-power portable licence-exempt networks (e.g., Wi-Fi) can coexist with important incumbent operations. Whilst technical studies on the operation of 5G/IMT services in the upper 6 GHz band are ongoing, they will almost certainly conclude that incumbents in the upper 6 GHz band will need similar levels of protection. Such requirements would allow licence-exempt networks (e.g., Wi-Fi) to operate in the band, but would make deployments of 5G/IMT networks commercially unviable.

In any case, the results of the IMT coexistence studies need to be supplemented with further research to make an informed decision on the future of the upper 6 GHz band. Indeed, each national administration needs to assess the extent to which the assumptions and criteria used in the studies apply to their own country. In many cases, the national regulatory authority will have to consider whether to run the studies with the actual data for their country (e.g. location of the fixed links, more precise assumptions on the likely

density of IMT base stations, etc.).

Even if the technical studies suggest IMT services could coexist with the incumbent services, it will still be necessary to assess whether the technical constraints of coexistence would be enough to support commercial mobile services that bring socio-economic benefit to citizens and businesses. Note, such constraints will most likely curb the funds governments would hope to raise for the spectrum licences.

More broadly, Europe needs to consider how reserving the upper 6 GHz band for licensed IMT services could hold back its digital economy. If, as a result of the WRC-23 proceedings, Region 1 were to identify the upper 6 GHz band for IMT, there is a danger that Europe would be left trailing behind other parts of the world in terms of connectivity. Whereas the Wi-Fi ecosystem has already certified hundreds of devices that can operate across the full 6 GHz band and the market has already seen large Wi-Fi 6E deployments[18], the IMT ecosystem would have to invest considerable time and resources to develop and deploy compatible devices, following lengthy and complex licence assignment processes.

In conclusion, we respectfully plead for the Radio Spectrum Policy Group to recommend Option 2 on the band 6 425 - 7 125 MHz - "No IMT identification" for WRC-23 Agenda Item 1.2.

12 August 2022

[18] In June 2022 the University of Michigan announced to have completed the upgrade of their Ann Arbor and Dearborn campuses, by replacing more than 16,000 wireless access points in over 225 indoor and outdoor locations. See https://michigan.it.umich.edu/news/2022/06/28/u-m-first-in-nation-to-offer-wifi-6e-universitywide-accomplishment-is-aninvestment- in-the-future/