

December 15, 2023

RSPG Secretariat
Avenue de Beaulieu 33,
B-1160, Bruxelles, office BU33 7/65
cnct-rspg@ec.europa.eu

Re: Public Consultation on the Draft RSPG Work Programme for 2024 and beyond

Dear Sir/Madam,

The Dynamic Spectrum Alliance (DSA)¹ respectfully submits these comments in response to the Radio Spectrum Policy Group (RSPG) consultation on the “Draft RSPG Work Programme for 2024 and beyond.” The DSA commends RSPG for its efforts to ensure efficient assignment and use of scarce radio frequencies and to make spectrum available for new wireless services that will facilitate competition, enhance connectivity, and promote investment.

The DSA believes that providing additional spectrum access options through use of new spectrum management tools, such as dynamic shared access systems, will benefit competition, create conditions for innovation, and spur more rapid deployments of wireless networks and services. We recommend that telecommunications regulators worldwide include licenced, licence-exempt, and lightly licenced options when allocating spectrum to wireless broadband services to avoid artificial scarcity, which could, in turn, increase the cost of broadband access. Both licenced and licence-exempt spectrum bands will play important and complementary roles in the delivery of advanced wireless services.

The DSA notes that the Draft RSPG Work Programme includes discussion of the future of the upper 6 GHz band (6425-7125 MHz) and competing interest in the band for high power licenced mobile use (WBB ECS) as well as for low power unlicensed WAS/RLAN. We also note the creation of a work item on long-term vision for the upper 6 GHz band (2030 and beyond) that will provide policy recommendations on how to “maximise the contribution of this part of spectrum to the achievement of digital connectivity targets for Europe.”

The Dynamic Spectrum Alliance (DSA) appreciates RSPG’s efforts to study the upper 6 GHz band and how it can be leveraged to meet digital connectivity targets for both consumer and enterprise networks. We are concerned, however, that a focus on the long-term vision (2030 and beyond) will overlook the band’s near-term prospects and ability to contribute to Europe’s immediate digital connectivity targets. There exists today the ability to use the upper 6 GHz band for licence-exempt low-power indoor (LPI) operations, very low power (VLP)

¹ The DSA is a global, cross-industry, not for profit organization advocating for laws, regulations, and economic best practices that will lead to more efficient utilization of spectrum, fostering innovation and affordable connectivity for all. Our membership spans multinationals, small-and medium-sized enterprises, as well as academic, research and other organizations from around the world all working to create innovative solutions that will benefit consumers and businesses alike by making spectrum abundant through dynamic spectrum sharing. A full list of DSA members is available on the DSA’s website at www.dynamicspectrumalliance.org/members

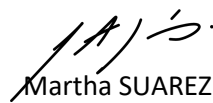
indoor / outdoor operations, and standard power (SP) operations, the latter under control of an Automated Frequency Coordination (AFC) system. Enabling licence-exempt use across the entire 6 GHz band will allow for near-term use of the latest generation of Wi-Fi and 5G NR-U standards to employ multiple high bandwidth 160 MHz and 320 MHz channels that support the channel diversity needed in dense deployments that exist both indoors and outdoors. With carefully crafted technical and operational conditions, these licence-exempt operations can share the band with incumbent operations that include the fixed satellite service (FSS) and fixed service (FS).

Longer term use of the upper 6 GHz band by wide-area IMT networks designed for outdoor and mobile operation may be possible, but it is still many years away and will necessitate the development of coexistence mechanisms to share the 6425-7125 MHz band among 3GPP (and other) IMT technologies, IEEE-based Wi-Fi, and incumbent users.

If RSPG's goal is European-wide harmonization of a hybrid sharing approach for the upper 6 GHz band and the creation of a corresponding global ecosystem of enabled equipment and DSMS solutions, there is considerable work that needs to be done to fill in the details of the proposed high-level concept. The very recent identification of the 6425-7125 MHz band² for use by administrations wishing to implement the terrestrial component of IMT indicates a clear intention of some administrations in Region 1 and within CEPT to use this band for traditional exclusive licenced IMT access. Fortunately, the same footnote indicates that these frequency bands are also to be used for the implementation of WAS, including RLANS, and that other administrations would like to enable additional spectrum for WAS/RLANS to achieve the important connectivity goals of the Digital Decade Policy Programme.

For these reasons, the DSA recommends that RSPG add to its work programme for 2024 and beyond the creation of an item on a short-term vision for the upper 6 GHz band that will provide policy recommendations on how to maximise the near-term contribution of this part of spectrum to the achievement of digital connectivity targets for Europe.

Respectfully submitted,



Martha SUAREZ
President
Dynamic Spectrum Alliance

² Note 5.6A12 The frequency bands 6 425-7 125 MHz in Region 1 and 7 025-7 125 MHz in Region 3 are identified for use by administrations wishing to implement the terrestrial component of International Mobile Telecommunications (IMT). This identification does not preclude the use of these frequency bands by any application of the services to which they are allocated and does not establish priority in the Radio Regulations. Resolution [COM4/7] (WRC 23) applies. The frequency bands are also used for the implementation of wireless access systems (WAS), including radio local area networks (RLANS). (WRC 23)