Dynamic Spectrum Alliance Limited
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Bilgi Teknolojileri ve İletişim Kurumu
Eskişehir Yolu 10.Km No: 276
Posta Kodu: 06530
Çankaya/Ankara
mfp@btk.gov.tr

Re: DSA response to the public consultation on "*Frekans Tahsisinden Muaf Telsiz Cihaz ve Sistemlerine İlişkin Teknik Ölçütler*"

Dear Sir/Madam,

The Dynamic Spectrum Alliance (DSA)[1] respectfully submits comments in response to the consultation of the reference. DSA sees strong additional spectrum needs for license-exempt systems to support the introduction of high-performance Wireless Access Systems including Radio Local Area Networks (WAS/RLAN) in Turkey.

Innovation is spurred by diversity of authorization methods and technologies. License-exemption, or general authorization, has without doubt been an extremely successful method that created a tremendous innovation push during the last decades. And it is in the license-exempt bands where some of the most intensive spectrum sharing occurs and horizontal sharing between applications delivers great value by supporting concurrent operation of multiple applications and technologies.

[1] The Dynamic Spectrum Alliance is a global, cross-industry alliance focused on increasing dynamic access to unused radio frequencies. The membership spans multinational companies, small- and medium-sized enterprises, academic, research, and other organizations from around the world, all working to create innovative solutions that will increase the utilization of available spectrum to the benefit of consumers and businesses alike. A full list of the DSA members is available on the DSA's website at www.dynamicspectrumalliance.org/members/.

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Wi-Fi remains the single most impactful technology to deliver connectivity, as the vast majority of the internet traffic initiates or terminates over Wi-Fi.[2] The EU has adopted ambitious plan to improve broadband coverage and deploy fixed networks and 5G networks. However, to reach the users where the vast majority of traffic is generated and consumed, i.e., within buildings, fixed and 5G networks rely on Wi-Fi. The current and next generation Wi-Fi technologies (Wi-Fi 6E and Wi-Fi 7) are capable of extending the bandwidth and QoS provided by gigabit access networks to the user, provided that appropriate regulatory conditions are ensured. Making a sufficient amount of spectrum available for Wi-Fi, or WAS/RLAN in general, is therefore critical to the success of both fixed and mobile initiatives.

The DSA recognizes the timely action from the Spectrum Management Department at the Information and Communication Technologies Authority (ICTA), publishing this consultation on updating the license-exempt regulations in line with the technological developments and the decisions of the international organizations, within the framework of the new plans and national needs. The inclusion of the 5945-6425 MHz frequency band for very low power and low power indoor applications is perfectly aligned with the discussions and decisions at the CEPT level and addresses current pressing bandwidth demands for end users, applications and industries.

Looking ahead to the future, the 6 GHz band will also benefit new applications such as Augmented and Virtual Reality and new innovations that require high-quality, real-time connectivity. However, as it stands today, future WAS/RLAN applications will not have access to a fully functional mid-band in the country as the 5945-6425 MHz band merely supports a single 320 MHz channel – or three 160 MHz channels. Advanced economies in all three ITU regions (e.g., USA, Canada, South Korea, Brazil, and Saudi Arabia) that have adopted forward-looking spectrum management strategies and acknowledged the need for sufficient license-exempt mid-band spectrum are enabling WAS/RLAN operations in the full 5925-7125 MHz band.

DSA acknowledges the importance of protecting the incumbent fixed links and fixed satellite systems operating in the 6425-7125 MHz band. Adopting the opening of this band to

[2] *See* Cisco Systems, Cisco Visual Networking Index: Global Mobile Data Traffic Forecast Update, 2017-2022. (link)

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WAS/RLAN as one objective of the European Radio Spectrum Policy Programme would both provide clear guidance on the objective while granting sufficient time to identify the appropriate mechanisms and regulatory framework for WAS/RLAN to safely operate in this band.

DSA would highly appreciate Turkey and the region investigating the possible use of the 6425-7125 MHz band for WAS/RLAN devices while protecting existing primary applications and services in the band.

Respectfully submitted,

Martha SUAREZ
President
Dynamic Spectrum Alliance