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Mr Peter STUCKMANN
Head of Unit
Directorate-General for Communications Networks, Content and Technology
Future Connectivity Systems (CNECT.E.1)
European Commission
Peter.Stuckmann@ec.europa.eu

Dear Mr. STUCKMANN,

I am contacting you as president of the **Dynamic Spectrum Alliance** as I understand that your services are organizing a targeted stakeholder survey on 5G in the context of the Digital Decade strategy.

The Dynamic Spectrum Alliance (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 and foster innovation and affordable connectivity for all. We advocate for policies that promote unlicensed and dynamic access to spectrum to unleash economic growth and innovation. Additionally, we advocate for a variety of technologies that allow spectrum sharing.[1]

DSA recommends the European Commission take a comprehensive approach to the increasing demand for both licensed and licence-exempt spectrum. An incomplete or partial approach might have the unintended consequence of creating an artificial scarcity which would stifle the development of wireless services in the EU.

We believe that such a comprehensive solution in the mid-bands for Europe will require making the upper part of the 6 GHz band (6425-7125 MHz) available for licence-exempt spectrum in a technology neutral manner. In addition, spectrum in the 3.8 -4.2 GHz band should be considered to give additional capacity to support local 5G, in particular for vertical industries.

The 3.8 -4.2 GHz band has been the band identified by the RSPG in its recent *Opinion on Additional spectrum needs and guidance on the fast rollout of future wireless broadband networks* and already made available, or proposed, for these vertical uses by regulators around the globe such as UK's Ofcom, Saudi Arabia's CITC, and Canada's ISED. The band is attractive for localized 5G deployment, in particular for vertical industry, due to the emerging and fast-growing 5G ecosystem in the band which is

[1] Our membership spans multinationals, small-and medium-sized enterprises, as well as academic, research and other organizations from around the world. A full list of DSA members is available on the DSA's website at www.dynamicspectrumalliance.org/members

standardised by 3GPP as band n77. Automated database shared access systems could be used to manage access to this band by new commercial and industrial users while simultaneously protecting incumbents. Although helpful in the 3.8 -4.2 GHz band, we strongly advise the European Commission against requiring such database-driven systems in the upper 6 GHz band for the operation of low power indoor (LPI) and very low power (VLP) RLAN use cases in the band.

Wi-Fi connectivity is the main enabler for the digitalization across society (consumers, public services, SMEs, industries, etc.) and can perfectly complement and thereby boost innovative applications based on other networks (such as 5G, 6G, satellite or fibre). Wi-Fi enables indoor digitalisation while mobile 5G will enable outdoor and mobile digitalisation. Together, these technologies will provide European citizens the experience expected in a truly digital gigabit society and will unfold massive economic opportunities in new markets for European SMEs and start-ups.

Wi-Fi is the primary way European citizens and businesses access the internet, especially indoors. Wi-Fi 6E (designed to operate in the 6 GHz band) and Wi-Fi 7 (the new standard in the pipeline) will provide much-needed improved wireless connectivity. Thanks to their low cost, easy deployment and enhanced performance, they will also support the widespread adoption of new digital applications and services that will enhance the productivity of industrial plants, enterprise campuses and other business facilities in a variety of domains including SME.

We are of the view that a comprehensive approach favouring equally the licensed and licence-exempt spectrum ecosystems requires making the additional 700 MHz of the upper part of the 6 GHz band available for license-exempt use in a technology neutral manner (for technologies such as 5G NR-U and Wi-Fi 6E LPI and VLP). Opening the 6425-7125 MHz to RLANs would not only allow Wi-Fi 7 to be available and fully operational in the EU (as no other band would enable this new standard), but also support greater competition and a more efficient mix of technologies in the mid-bands. Not less importantly, a combination of full-fibre and energy-efficient Wi-Fi technologies such as Wi-Fi 7 represents the greenest way to connect indoors, so the right mix of 5G and Wi-Fi spectrum should be implemented in support of the green transition objectives. Therefore, we strongly plead against granting the upper 6 GHz band to IMT in Europe. If Europe wants to reap the full benefits of the digital economy, it should ensure additional spectrum for Wi-Fi 6E and Wi-Fi 7. Prominent economies and digital pioneers around the world such as the US, Brazil and South Korea are already leading the way on this front releasing the full 6 GHz (5925-7125 MHz) band for license-exempt access and Wi-Fi use. Europe must not miss this unique opportunity to become a front-runner of Wi-Fi innovation and open new Wi-Fi-based markets for its SMEs and start-ups.

Therefore, when it comes to question 24a) of the targeted stakeholder survey on 5G, addressing the need of additional spectrum capacity for 5G, we consider that one should duly consider the needs for license-exempt spectrum access in these bands for wireless devices in addition to the needs for the 5G industry. The only way for Europe to secure the sustainability of Wi-Fi connectivity and ensure its citizens benefit from the new applications and services enabled by Wi-Fi 7, is fully dedicating the 6425-7125 MHz band to licence-exempt access, while maintaining availability of the band for incumbents. Any other

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solution would prevent the operation of LPI and VLP RLAN use cases in the band. As outlined in a report earlier this year from Telecom Advisory Services, the economic and social benefits obtained when enabling LPI and VLP in the upper 6 GHz band are very significant.

We thank you for your attention to this topic and remain obviously at your entire disposal for any follow-up discussion.

Respectfully submitted,

Martha SUAREZ
President
Dynamic Spectrum Alliance