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Telecommunications Regulatory Commission (TRC)
Mohammad Alwathiq Shaqrah
Director Radio Spectrum Management Department
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Re: DSA Comments to the Public Consultation on the Draft Regulation for Wi-Fi 6E in Jordan

Dear Sir/Madam,

The Dynamic Spectrum Alliance ("DSA"[1]) respectfully submits its comments to the Telecommunications Regulatory Commission (TRC) in response to the Public Consultation on the Draft Regulation for Wi-Fi 6E in Jordan published on 12 October 2021.

The DSA commends the TRC's leadership in opening the 5925-6425 MHz band for Wi-Fi 6E operations in Jordan and believes that the regulations proposed by the TRC constitute an important first step to provide greater capacity for data transfer, bridge the digital gap, and incentivize modern technologies. The decision to dedicate more spectrum to wireless radio local access systems under license exempt frameworks in the 6 GHz band will immediately benefit Jordanian citizens with better Wi-Fi services and access to affordable license-exempt wireless devices.

The DSA is available to discuss these comments and any additional requirement the TRC might have.

Respectfully submitted,

Dr. Martha SUAREZ
President,
Dynamic Spectrum Alliance

[1] 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, fostering innovation and affordable connectivity for all. A full list of DSA members is available on the DSA's website.

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DSA COMMENTS TO THE PUBLIC CONSULTATION ON THE DRAFT REGULATION FOR WI-FI 6E IN JORDAN

The TRC is proving its regional leadership by identifying radioelectric spectrum in the 6 GHz band for the development of Wi-Fi 6 and other innovative use cases in Jordan in favour of its citizens. This step is fundamental to improve Wi-Fi connectivity in homes, companies, as well as in government and public institutions.

The DSA agrees with the TRC considerations and is convinced that opening the 5925-6425 MHz frequency band for Wi-Fi is an important first step to ensure that this widely used wireless technology can deliver the necessary performance for future applications and networks.

The DSA welcomes and supports the regulatory conditions proposed by the TRC for the deployment of Wi-Fi 6E operating in the 5925-6425 MHz band:

- Authorization of Low Power Indoor (LPI) devices, operating indoors with a maximum transmit power (EIRP) of 23 dBm (200 mW).
- Authorization of Very Low Power (VLP) devices, operating indoors or outdoors with a maximum transmit power (EIRP) of 14 dBm (25 mW).

The DSA respects the decision of the TRC to open at this time only the 5925-6425 MHz ("lower 6 GHz") band for license-exempt/Wi-Fi operation. This notwithstanding, we kindly encourage the TRC to review this decision and also consider opening the 6425-7125 MHz ("upper 6 GHz") band for license-exempt/Wi-Fi use in the near future.

While discussions are taking place in ITU Region 1 about the future of the upper part of the 6 GHz band given considerations to identify this band for International Mobile Telecommunications (IMT) at the World Radiocommunication Conference 2023 (WRC-23), a growing number of countries across all three ITU regions have already made or are in the process of making the full 6 GHz band (5925-7125 MHz) available for license-exempt use. After already having opened the lower 6 GHz band for license-exempt use, the European Conference of Postal and Telecommunications Administrations (CEPT) very recently decided to conduct coexistence studies[2] between license-exempt WAS/RLAN systems and incumbents operating in the upper 6 GHz band in response to requests from several European administrations.

Ideally, all countries and all regions should ultimately enable license-exempt access to the entire 1200 MHz in the 6 GHz band. This harmonisation would result in major economies of scale,

[2] https://www.cept.org/Documents/ecc/67297/ecc-21-080-annex-22_new-work-item-on-was_rlan-in-6425-7125-mhz

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reducing costs for end-users and allowing people all over the world to benefit from innovative new services that harness the capabilities of Wi-Fi 6E.

Users, both in homes and businesses, increasingly require new applications with high data transmission capacities on the order of Gbps, applications such as virtual reality and augmented reality, interactive content, high-definition video (4k and 8k), and artificial intelligence. These requirements associated with higher video consumption require adapted networks with higher bandwidths and additional spectrum for WAS/RLAN networks. In these cases, having 1200 MHz of unlicensed spectrum in the 6 GHz band, rather than merely 500 MHz, will make a big difference for users, since it will be possible to use more than three 160 MHz channels simultaneously. Keep in mind that Wi-Fi access is crucial not only in homes, but also in corporate environments, industrial facilities, factories, companies and in highly crowded places such as airports, stadiums, shopping centers, and other public hotspots.

The decision to enable unlicensed access to 1200 MHz of spectrum in the 6 GHz band would confirm TRC's long-term vision, laying the groundwork for early adoption of Wi-Fi 7[3] in Jordan. Indeed, the standardization process of the next generation of the IEEE 802.11 family standard, 802.11be, also known as Wi-Fi 7, is ongoing. The initial draft (0.1) is expected to be defined in the first half of 2021, with the launch of certification processes at the end of 2023, including channels of up to 320 MHz of bandwidth for Wi-Fi connections and other functionalities.

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[3] Wi-Fi Alliance, "Capacity, efficiency, and performance for advanced connectivity". Ver https://www.wi-fi.org/discover-wi-fi/wi-fi-certified-6