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February 4, 2022

Chief Executive Officer
Utilities Regulation and Competition Authority
Frederick House, Frederick Street, Nassau
PO Box N-4860
Bahamas
info@urcabahamas.bs

Re: DSA Comments to the Utilities Regulation and Competition Authority ("URCA") on the Public Consultation on its draft Annual Plan for 2022.

Dear Sir/Madam,

The Dynamic Spectrum Alliance (DSA[1]) respectfully submits its comments in response to the Public Consultation on the draft Annual Plan for 2022.[2]

DSA congratulates URCA for the achievements in 2021 and the definition of the projects and initiatives for 2022. Among the identified objectives, DSA would like to comment on the one that proposes to "revise the Electronic Communications Sector Policy **to address the government's position on emerging technologies**, more specifically 5G". DSA respectfully recommends URCA to take a technology neutral approach, focused on broadband access, considering different emerging technologies that will underpin the social and economic development of The Bahamas, such as 5G, fiber, satellite and Wi-Fi.

DSA celebrates that the promotion of investment and innovation in electronic communications networks and services and the optimal use of radio spectrum are among the main policy objectives of the Electronic Communications Sector (ECS). Indeed, there is a global push toward digital transformation is stimulating the current wave of innovation and investment in the telecommunications industry. That push goes beyond one particular technology and should be understood from a neutral perspective: citizens and businesses in The Bahamas should be given the ability to choose the gigabit technologies best suited to their specific needs.

DSA celebrates the plans to initiate discussions with key stakeholders and the public on 5G, the effective management of radio spectrum to achieve "optimal use and promote investment, innovation and sustainable competition" and we look forward to participating in the process this year. As a complement

[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

[2] Available online at https://www.urcabahamas.bs/publications/urca-draft-annual-plan-2022-urca-2022/

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to this important project, DSA believes that URCA should also consider dedicating the entire 1200 MHz (5925-7125 MHz) of the 6 GHz band for license-exempt use, taking advantage of the full potential of this band. DSA believes that the highest and best use for this band is for Wireless Access Systems including Radio Local Area Networks (WAS/RLAN). WLAN/RLAN are expected to carry offload from cellular 5G technologies (total data offload to unlicensed going from 74% to 79% in 2022).[3] This will lower the costs of network deployment for mobile operators and for edge investment by neutral host and third-party providers. Importantly, it will also lower costs for consumers.

Wi-Fi accounts for over half of total traffic (fixed and mobile) transferred over the Internet[4] and generates enormous economic value[5]. As the trend towards mobility continues to increase globally, Wi-Fi is present in our lives providing wireless connectivity inside our homes and offices, but also at public hotspots such as hotels, cafes and restaurants, airports, libraries, or hospitals. Wi-Fi is the local wireless extension of the indoor fixed broadband connection for mobile devices (e.g. smartphone, tablets, laptops, etc) or for (semi) fixed terminals that are not/cannot be connected to the fixed-line network, for example because the fixed line does not reach all the in-building premises (e.g. smart TV, smart home devices, etc). Although less visible, Wi-Fi is also heavily used by industries to provide connectivity for IoT devices in e.g. smart factories.

Due to the widespread lockdowns, the Covid-19 health crisis has increased time spent on fixed broadband inside our homes. This has further underscored the importance and need for high-quality fixed connectivity (such as fibre) at home, including Wi-Fi, which is the primary way our devices connect to the fixed network. During the Covid-19 lockdowns, many of us have safely continued working, shopping, learning, entertaining, socializing and communicating with our doctors and administrations. This trend will continue once the epidemic is over. The unprecedented increase in data traffic during the pandemic has also exposed the limits of existing Wi-Fi networks, which had not seen any new licence-exempt spectrum released since 2004.

DSA believes that making the 6 GHz band available for license-exempt use opens the band for new technologies and applications while allowing incumbent services to continue to operate. Furthermore, there is a considerable regional and global momentum to make the entire 6 GHz band available for license-exempt use. In the Americas, the United States, Brazil, Canada, Chile, Peru, Costa Rica, Honduras, and Guatemala have already permitted license-exempt use across the entire 6 GHz band. Mexico, Argentina and Colombia had consultations about the band with final decisions expected soon.

DSA has recently published a whitepaper about the 6 GHz band that answers the question of Why 1200 MHz and why now?[6] That whitepaper provides further details on the importance of enabling unlicensed access to the 6 GHz band.

[3] *See* Cisco Systems, Cisco Visual Networking Index: Global Mobile Data Traffic Forecast Update, 2017-2022. (link)
[4] Cisco Visual Networking Index: Forecast and Trends, 2017–2022, available online at https://davidellis.ca/wp-content/uploads/2019/05/cisco-vni-feb2019.pdf.
[5] Wi-Fi Alliance: Global Economic Value of Wi-Fi® (2021-2025).
[6] Dynamic Spectrum Alliance, "6 GHz License-Exempt: Why 1200 MHz and why now?", August 2021. (link).

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DSA appreciates the opportunity to participate in this consultation and to present our views and comments on the Draft Annual Plan for 2022. We are available to discuss these comments and provide any additional information.

Respectfully submitted,

Martha SUAREZ
President
Dynamic Spectrum Alliance