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**IEEE P802.18**  
**Radio Regulatory Technical Advisory Group (RR-TAG)**

Draft Response to China MIIT's consultation on the proposed  
abolition of two normative documents re: 40-50 GHz band

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This document drafts a proposed response to the consultation issued by the Ministry of Industry and Information Technology (MIIT) of the People's Republic of China for the proposed abolition of two normative documents re: 40-50 GHz band.

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5 Electronic filing

September 9, 2023

6  
7 Re: Consultation on the proposed abolition of two normative documents re: 40-50 GHz band

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9 Dear Telecommunications Bureau,

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11 IEEE 802 LAN/MAN Standards Committee (LMSC) thanks the Ministry of Industry and  
12 Information Technology (MIIT) of the People’s Republic of China for issuing the consultation that  
13 call for comments on the proposed abolition of the two normative documents, namely Circular No.  
14 2013 No. 500 “Ministry of Industry and Information Technology's Issues Regarding Frequency  
15 Use of Point-to-Point Wireless Access Systems in Fixed Services in the 40-50 Gigahertz (GHz)  
16 Band” and Circular No. 2013 No. 502 “Notice of the Ministry of Industry and Information  
17 Technology on Publishing Matters concerning Frequency Use of Broadband Wireless Access  
18 Systems in Mobile Services in the 40-50 Gigahertz (GHz) Band”.

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20 IEEE 802 LMSC is a leading consensus-based industry standards body, producing standards for  
21 wireless networking devices, including wireless local area networks (“WLANs”), wireless  
22 specialty networks (“WSNs”), wireless metropolitan area networks (“Wireless MANs”), and  
23 wireless regional area networks (“WRANs”). We also produce standards for wired Ethernet  
24 networks, and technologies produced by implementers of our standards are critical for all  
25 networked applications today.

26  
27 IEEE 802 LMSC is a committee of the IEEE Standards Association and Technical Activities, two  
28 of the Major Organizational Units of the Institute of Electrical and Electronics Engineers (IEEE).  
29 IEEE has about 400,000 members in over 160 countries. IEEE’s core purpose is to foster  
30 technological innovation and excellence for the benefit of humanity. In submitting this document,  
31 IEEE 802 LMSC acknowledges and respects that other components of IEEE Organizational Units  
32 may have perspectives that differ from, or compete with, those of IEEE 802 LMSC. Therefore,  
33 this submission should not be construed as representing the views of IEEE as a whole<sup>1</sup>.

34  
35 Please find below the IEEE 802 LMSC’s specific comments on the proposed abolition of the  
36 following normative document, Circular No. 2013 No. 502 “Notice of the Ministry of Industry and  
37 Information Technology on Publishing Matters concerning Frequency Use of Broadband Wireless  
38 Access Systems in Mobile Services in the 40-50 Gigahertz (GHz) Band”.

39  
40 ***IEEE 802.11 devices operating in the 40 GHz to 50 GHz band***

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42 The IEEE Std 802.11aj-2018 standard [1] support frequency operation in the 42.3 GHz to 47 GHz  
43 and 47.2 GHz to 48.4 GHz frequency bands. The channelization of IEEE 802.11aj includes 10  
44 channels with a bandwidth of 540 MHz each and 5 channels with a bandwidth of 1080 MHz each.  
45 In China’s densely populated cities, and with the ubiquitous use of mobile devices, IEEE 802.11aj  
46 provides a robust solution to mitigate device interference, lowering instantaneous power  
47 requirements and increasing coverage, especially for small form-factor, battery-powered devices  
48 with small antennas. It also promotes the development of related technologies and applications  
49 that leverage spectrum uniquely available in China.

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<sup>1</sup> This document solely represents the views of IEEE 802 LMSC and does not necessarily represent a position of either the IEEE or the IEEE Standards Association.

51 In November 2023, an IEEE 802.11 study group dedicated to the enhanced specification of  
52 millimeter Wave operation for WLAN connectivity will begin work, with the target of specifying  
53 frequency operation between 42.5 GHz and 71 GHz and defining integration with the multi-link  
54 operation framework specified by IEEE P802.11be [2]. The 40 GHz to 50 GHz bands will  
55 therefore be of continued relevance for the WLAN ecosystem.

56

57 *The normative document should be retained*

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59 IEEE 802 LMSC believes that the MIIT should retain the normative document to support the use  
60 of broadband wireless access systems in mobile services, including radio local area network  
61 (RLAN), in the 40 GHz and 50 GHz band. Retaining the document strengthen the MIIT's goals to  
62 improve spectrum utilization and further the development of telecommunications industry  
63 ecosystem.

64

### 65 **Conclusion**

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67 IEEE 802 LMSC thanks the MIIT for the opportunity to provide this submission and kindly  
68 requests MIIT to consider our responses in its future decisions regarding the use of broadband  
69 wireless access systems in mobile services in the 40 GHz and 50 GHz band.

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71 Respectfully submitted,

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73 By: /s/.

74 Paul Nikolich

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78 References:

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80 [1] "IEEE Standard for Information Technology--Telecommunications and information  
81 exchange between systems Local and metropolitan area networks--Specific requirements  
82 Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY)  
83 Specifications Amendment 3: Enhancements for Very High Throughput to Support Chinese  
84 Millimeter Wave Frequency Bands (60 GHz and 45 GHz)," in IEEE Std 802.11aj-2018  
85 (Amendment to IEEE Std 802.11-2016 as amended by IEEE Std 802.11ai-2016 and IEEE  
86 Std 802.11ah-2016), vol., no., pp.1-306, 18 April 2018, doi:  
87 10.1109/IEEESTD.2018.8345727.

88 [2] "IEEE Draft Standard for Information technology—Telecommunications and information  
89 exchange between systems Local and metropolitan area networks—Specific requirements -  
90 Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY)  
91 Specifications Amendment: Enhancements for Extremely High Throughput (EHT)," in IEEE  
92 P802.11be/D3.0, January 2023, vol., no., pp.1-999, 1 March 2023.