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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 LAN/MAN Standards Committee (IEEE 802 LMSC) is a leading consensus-based open  
21 standards development committee for networking standards that are used by industry globally. It  
22 produces standards for networking devices, including wired and wireless local area networks  
23 ("LANs" and "WLANs"), wireless specialty networks ("WSNs"), wireless metropolitan area  
24 networks ("Wireless MANs"), and wireless regional area networks ("WRANs"). Technologies  
25 produced by implementers of our standards are a critical element for all networked applications  
26 today.

27  
28 IEEE 802 LMSC is a committee of the IEEE Standards Association and of Technical Activities,  
29 two of the Major Organizational Units of the IEEE. IEEE has about 400,000 members in over 160  
30 countries and its core purpose is to foster technological innovation and excellence for the benefit  
31 of humanity. IEEE is also a major accredited standards development organization whose standards  
32 are recognized world-wide. In submitting this document, IEEE 802 LMSC acknowledges and  
33 respects that other components of IEEE Organizational Units may have perspectives that differ  
34 from, or compete with, those of IEEE 802 LMSC. Therefore, this submission should not be  
35 construed as representing the views of IEEE as a whole<sup>1</sup>.

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

41  
42 ***IEEE 802.11 devices operating in the 40 GHz to 50 GHz band***

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

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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.

50 with small antennas. It also promotes the development of related technologies and applications  
51 that leverage spectrum uniquely available in China.

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

58

59 ***The normative document should be retained***

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

66

67 **Conclusion**

68

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

72

73 Respectfully submitted,

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75 By: /ss/.

76 Paul Nikolich

77 IEEE 802 LAN/MAN Standards Committee Chairman

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80 References:

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82 [1] "IEEE Standard for Information Technology--Telecommunications and information  
83 exchange between systems Local and metropolitan area networks--Specific requirements  
84 Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY)  
85 Specifications Amendment 3: Enhancements for Very High Throughput to Support Chinese  
86 Millimeter Wave Frequency Bands (60 GHz and 45 GHz)," in IEEE Std 802.11aj-2018  
87 (Amendment to IEEE Std 802.11-2016 as amended by IEEE Std 802.11ai-2016 and IEEE  
88 Std 802.11ah-2016), vol., no., pp.1-306, 18 April 2018, doi:  
89 10.1109/IEEESTD.2018.8345727.

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