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

Draft response to EU RSPG's questionnaire on long-term vision for  
the upper 6 GHz band

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4 This document drafts a proposed response to EU Radio Spectrum Policy Group (RSPG)'s questionnaire on long-term vision for the upper 6 GHz band

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5 Electronic filing

August 20, 2024

6  
7 Re: Questionnaire on long-term vision for the upper 6 GHz band

8  
9 Dear Radio Spectrum Policy Group,

10  
11 IEEE 802 LAN/MAN Standards Committee (LMSC) thanks the Radio Spectrum Policy Group  
12 (RSPG) for issuing the consultation “Questionnaire on long-term vision for the upper 6 GHz band”  
13 and for the opportunity to provide feedback on this important topic.

14  
15 IEEE 802 LAN/MAN Standards Committee (IEEE 802 LMSC) is a leading consensus-based open  
16 standards development committee for networking standards that are used by industry globally. It  
17 produces standards for networking devices, including wired and wireless local area networks  
18 (“LANs” and “WLANs”), wireless specialty networks (“WSNs”), wireless metropolitan area  
19 networks (“Wireless MANs”), and wireless regional area networks (“WRANs”). Technologies  
20 produced by implementers of our standards are a critical element for all networked applications  
21 today.

22  
23 IEEE 802 LMSC is a committee of the IEEE Standards Association and of Technical Activities,  
24 two of the Major Organizational Units of the IEEE. IEEE has about 400,000 members in over 160  
25 countries and its core purpose is to foster technological innovation and excellence for the benefit  
26 of humanity. IEEE is also a major accredited standards development organization whose standards  
27 are recognized worldwide. In submitting this document, IEEE 802 LMSC acknowledges and  
28 respects that other components of IEEE Organizational Units may have perspectives that differ  
29 from, or compete with, those of IEEE 802 LMSC. Therefore, this submission should not be  
30 construed as representing the views of IEEE as a whole<sup>1</sup>.

31  
32 Please find below the IEEE 802 LMSC’s comments on this questionnaire. IEEE 802 LMSC  
33 provides standards for both WAS/RLAN (Wi-Fi) and UWB technologies. Our responses to  
34 Sections A and B address the separate questions for the respective technologies.

35  
36 Respectfully submitted

37  
38 By: /ss/.  
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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 or the IEEE Technical Activities.

42 **Section A: WAS/RLAN**43 ***I) Explain the demand for MFCN or WAS/RLAN in the upper 6GHz band before and beyond***  
44 ***2030***

45

46 Wi-Fi is the indoor wireless connectivity technology of choice for people in Europe. According  
47 to BNetzA<sup>2</sup> and Ofcom<sup>3</sup>, the majority of internet use occurs over fixed networks primarily  
48 delivered through Wi-Fi. A recent survey also finds that the vast majority (93.9%) of the European  
49 Union's enterprises use fixed broadband connections to access the Internet via Wi-Fi<sup>4</sup>.

50

51 The volume of Wi-Fi traffic is growing much faster than the volume of traffic carried over mobile  
52 networks. BNetzA reports that the increase in the volume of fixed traffic in 2023 was more than  
53 4 times the increase in the volume of mobile traffic in the same year<sup>5</sup>. According to Arthur D  
54 Little<sup>6</sup>, it forecasts that the growth in fixed data traffic (and therefore Wi-Fi traffic) in Europe  
55 between 2022 and 2030 is similar to past elevated levels, and the total volume of fixed data traffic  
56 is significantly more than that of the mobile data traffic over the same period of time. The  
57 estimated significant increase in the volume of fixed data traffic is supported by two recently  
58 released marketing reports from the FTTH Council Europe<sup>7,8</sup> that the number of FTTH/FTTB  
59 (Fiber-To-The-Home or Building) services is expected to increase from 121 million in 2023 to 201  
60 million by 2029, and the number of homes equipped with FTTH/FTTB will be increased from 244  
61 million in 2023 to 312 million in 2029 as telcos lay more fiber in the ground.

62

63 Currently available Wi-Fi 6/6E products based on the IEEE Std 802.11ax-2021 standard<sup>9</sup> and Wi-  
64 Fi 7 products based on the IEEE P802.11be project<sup>10</sup> are already capable of operating in the entire  
65 6 GHz band. By enabling Wi-Fi operation in the upper 6 GHz band, a significant number of large  
66 bandwidth (i.e., 160 MHz and 320 MHz) channels will be available that in turn enable high traffic  
67 requirement applications like Extended Reality (XR). The upper 6 GHz band is also crucial for  
68 enabling deployments of wireless mesh networks in 6 GHz, since out-of-band channels are

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<sup>2</sup> See Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen: Jahresbericht Telekommunikation 2023, 16 May 2024, [https://data.bundesnetzagentur.de/Bundesnetzagentur/SharedDocs/Mediathek/Berichte/2023/240515\\_JB\\_TK\\_23\\_web.pdf](https://data.bundesnetzagentur.de/Bundesnetzagentur/SharedDocs/Mediathek/Berichte/2023/240515_JB_TK_23_web.pdf) [accessed: 9 August 2024]

<sup>3</sup> See Ofcom: Communications Market Report 2024, 18 July 2024, <https://www.ofcom.org.uk/phones-and-broadband/service-quality/communications-market-2024/> [accessed: 9 August 2024] (“Seventy-one per cent of broadband connections were provided using fibre technologies at the end of 2023.”)

<sup>4</sup> See eurostat: Fixed internet connection in 94% of EU enterprises, 25 January 2024, <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20240125-2> [accessed: 9 August 2024].

<sup>5</sup> See Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen: Press release of Jahresbericht Telekommunikation 2023, 16 May 2024, [https://www.bundesnetzagentur.de/SharedDocs/Pressemitteilungen/DE/2024/20240516\\_JB\\_TK2023.html?nn=659670](https://www.bundesnetzagentur.de/SharedDocs/Pressemitteilungen/DE/2024/20240516_JB_TK2023.html?nn=659670) [accessed: 9 August 2024] (“In 2023, a total data volume of around 132 billion GB was transmitted in fixed networks in Germany. This corresponds to an average data volume of around 287 GB per connection per month. Compared to 2022, the data volume transmitted in fixed networks in Germany increased by around 11 billion GB.”) and (“According to surveys by the Federal Network Agency, the data volume transmitted via mobile networks in Germany in 2023 amounted to 9,118 million GB, compared to 6,714 million GB in 2022.”)

<sup>6</sup> See: Arthur Little: The evolution of data grow in Europe, <https://www.adlittle.com/en/insights/report/evolution-data-growth-europe> [accessed 9 August 2024] (“We expect average fixed data consumption to grow from approximately 225 GB/month in 2022 to 900 GB/month per home by 2030, accounting for an overall annual growth rate of 20%, similar to past elevated levels.”) and (“We expect Europe's mobile data consumption per user to continue growing in the coming years, increasing from the 2022 level of approximately 15 GB/month to 75 GB/month by 2030, creating an annual growth rate of 25%.”)

<sup>7</sup> See FTTH Council Europe: European FTTH/B Market Panorama 2024, <https://www.ftthcouncil.eu/committees/market-intelligence/2043/european-ftth-b-market-panorama-2024> [accessed: 9 August 2024].

<sup>8</sup> See FTTH Council Europe: FTTH Market Forecast 2023-2029, <https://www.ftthcouncil.eu/committees/market-intelligence/2046/ftth-market-forecasts-2023-2029> [accessed: 9 August 2024].

<sup>9</sup> “IEEE Standard for Information Technology--Telecommunications and Information Exchange between Systems Local and Metropolitan Area Networks--Specific Requirements Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications Amendment 1: Enhancements for High-Efficiency WLAN,” in IEEE Std 802.11ax-2021 (Amendment to IEEE Std 802.11-2020), vol., no., pp.1-767, 19 May 2021, doi: 10.1109/IEEESTD.2021.9442429.

<sup>10</sup> See “IEEE Draft Standard for Information technology--Telecommunications and information exchange between systems Local and metropolitan area networks--Specific requirements - Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications Amendment: Enhancements for Extremely High Throughput (EHT),” in IEEE P802.11be/D6.0, May 2024, vol., no., pp.1-1075, 17 May 2024.

69 required to establish wireless backhaul links between infrastructure and Wi-Fi access points (in  
70 addition to existing wireless links between Wi-Fi access points and client devices).

71  
72 Projections<sup>11</sup> forecasts that real-time locating services are expected to grow by almost 15% a year  
73 between 2021 and 2030, and there is an increasing importance of real-time location and sensing  
74 services with high (sub-meter) accuracy. By allocating the upper 6 GHz band for license-exempt  
75 operation, the above-mentioned large bandwidth channels enable Wi-Fi based location and sensing  
76 services with sub-meter positioning and sensing accuracy based on IEEE Std 802.11az-2023<sup>12</sup> and  
77 IEEE P802.11bk<sup>13</sup>.

## 78 79 ***II.1) Provide information about the sustainability of the above explained demand, especially the*** 80 ***environmental impact assessment***

81  
82 The European Union has been investing heavily in its full-fibre upgrades<sup>14</sup> to meet the above  
83 explained demand in 2030. It has been remarked in several studies produced by or for European  
84 institutions that networks using IEEE 802 wireless technologies, in combination with wired  
85 backhaul over long distances, are the current leaders in terms of energy efficient networks<sup>15,16,17</sup>.

86  
87 Wi-Fi provides a highly efficient way to deliver high-speed connectivity indoors. For example,  
88 Wi-Fi 6/6E specification built on IEEE Std 802.11ax-2021 standard introduces a new feature,  
89 namely broadcast Target Wake Time (TWT)<sup>18</sup>, as an energy-efficient scheduling mechanism for  
90 transmissions between an AP and a wireless client. Wi-Fi 7 specification built on IEEE P802.11be  
91 project specifies multi-link operation (MLO), which defines an energy-efficient way for an AP to  
92 manage and coordinate traffic over several bands with a multi-link device (MLD)<sup>19</sup>.

93  
94 Delivering high-speed and responsive connectivity, Wi-Fi 6/6E and Wi-Fi 7 are well suited to  
95 delivering high-resolution video streams and XR services that can help people conduct meetings  
96 and interact with one another effectively without being physically present in the same location.  
97 These applications are typically indoor, where Wi-Fi is the technology of choice. In contrast,  
98 connecting an indoor device to an outdoor station uses an excessive amount of energy<sup>20</sup>, resulting  
99 in more frequent recharge, increased battery wear, and hence electronic waste.

100  
<sup>11</sup> See ABI Research: Indoor Positioning and RTLS: Technology Infrastructure, Applications, and Revenue, <https://www.abiresearch.com/market-research/product/market-data/MD-RTLS/> [accessed: 9 August 2024]

<sup>12</sup> "IEEE Standard for Information Technology--Telecommunications and Information Exchange between Systems Local and Metropolitan Area Networks--Specific Requirements Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications Amendment 4: Enhancements for Positioning," in IEEE Std 802.11az-2022 (Amendment to IEEE Std 802.11-2020 as amended by IEEE Std 802.11ax-2021, IEEE Std 802.11ay-2021, IEEE Std 802.11ba-2021, and IEEE Std 802.11-2020/Cor 1-2022) , vol., no., pp.1-248, 3 March 2023, doi: 10.1109/IEEESTD.2023.10058117.

<sup>13</sup> See IEEE P802.11bk, [https://www.ieee802.org/11/Reports/tgbc\\_update.htm](https://www.ieee802.org/11/Reports/tgbc_update.htm) [accessed: 9 August 2024].

<sup>14</sup> See European Parliament briefing: A future-proof network for the EU: Full fibre and 5G, April 2024, [https://www.europarl.europa.eu/RegData/etudes/BRIE/2024/762298/EPRS\\_BRI\(2024\)762298\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2024/762298/EPRS_BRI(2024)762298_EN.pdf) [accessed 9 August 2024]

<sup>15</sup> WIK-Consult and Ramboll, Final Study Report for EU BEREC "External Sustainability Study on Environmental impact of electronic communications," BoR (22) 34, 15 March 2022.

<sup>16</sup> The digital environmental footprint in France: ADEME and Arcep submit their first report to the Government, 19 January 2022. [Available online](#) [accessed: 9 August 2024].

<sup>17</sup> Radio Spectrum Policy Group RSPG21-0041-final, RSPG Opinion on the role of radio spectrum policy to help combat climate change. [Available online](#) [accessed: 9 August 2024]

<sup>18</sup> Broadcast TWT has the advantage of allowing larger throughput while lowering latency since both devices are not only be aware of when transmissions will be made, but also enable energy efficiency since the devices can be idle or quiet when transmissions do not need to be made.

<sup>19</sup> If an MLD is capable of simultaneously sending traffic on links operating at 2.4 GHz, 5 GHz and 6 GHz bands, but the current load on the network is such that only one or two of these links are necessary to provide a robust service level, the other one or two links can be quieted and/or can be in power save mode dynamically. The links can be un-quieted once the load on the network increases, with the result that the radios consume only the amount of energy they need for a given traffic load.

<sup>20</sup> To provide indoor coverage from outdoor base stations, IMT has to compensate for the 23 dB building entry loss (see ITU-R P2109, 30/70 Thermal/Traditional, 50%). As a result, 200 times more power is required to cover indoors than outdoors.

101 Authorizing the entire 6 GHz band for license exempt operation makes it possible to allocate more  
102 channels for Wi-Fi operation, which reduces interference, improves performance, and further  
103 reduces overall power consumption.

104

105 ***II.2) Provide information about the sustainability of the above explained demand, especially the***  
106 ***social economic assessment***

107

108 Wi-Fi is a fundamental building block of both the digital economy and the digital services that are  
109 benefiting European citizens and fueling economic growth in Europe.

110

111 Wi-Fi contributes to gross domestic product (GDP) growth in Europe positively by providing low-  
112 cost broadband access and helping to bridge the digital divide by maximally utilizing the available  
113 backhaul connectivity. The economic value provided by Wi-Fi to the European Union reached  
114 USD \$458 billion in 2021, and is expected to increase to USD \$637 billion by 2025<sup>21</sup>.

115

116 Significant global deployment of Wi-Fi devices, which are based on IEEE 802.11 standards, is  
117 evident from the data, that, by the end of 2024<sup>22</sup>, 21.1 billion Wi-Fi devices will be in use and  
118 576.2 million Wi-Fi CERTIFIED 6E devices will enter the market. The current widespread  
119 availability of Wi-Fi devices that can access and use the entire 6 GHz band means that most  
120 enterprises and industries in Europe will see immediate and sustained economic benefit from  
121 license-exempt access to the upper 6 GHz band.

122

123 Fibre broadband offering with speeds of up to 25 Gbps to residential customers is increasing in  
124 EMEA. Full capitalization of this huge investments is only possible by allowing European citizens  
125 to make use of the available speeds through multi-gigabit Wi-Fi services that can be supported  
126 only through expansion in the 6 GHz band.

127

128 ***III.1) Provide information about the possible role of the upper 6 GHz for MFCN or WAS/RLAN***

129

130 Wi-Fi access to the upper 6 GHz band is critical to meeting the goals of the European Union's  
131 Gigabit Infrastructure Act<sup>23</sup> and the Digital Decade Policy Programme 2023<sup>24</sup>.

132

133 According to Plum<sup>25</sup>, the current spectrum for Wi-Fi access in Europe is not sufficient to support  
134 these goals. For example, the current allocation of five 160 MHz channels in the 5 GHz and lower  
135 6 GHz bands can support gigabit coverage to only approximately 50-60% of residential building  
136 area. To ensure complete gigabit coverage, a minimum of ten channels is necessary thus  
137 necessitating operation of Wi-Fi technologies in the upper 6 GHz band.

138

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<sup>21</sup> See Wi-Fi Alliance: Global economic value of Wi-Fi® 2021-2025, [https://www.wi-fi.org/system/files/Global\\_Economic\\_Value\\_of\\_Wi-Fi\\_2021-2025\\_202109.pdf](https://www.wi-fi.org/system/files/Global_Economic_Value_of_Wi-Fi_2021-2025_202109.pdf) [accessed: 9 August 2024].

<sup>22</sup> See IDC: Worldwide Wi-Fi Technology Forecast, 2023-2027, <https://www.idc.com/getdoc.jsp?containerId=US50019923> [accessed: 9 August 2024].

<sup>23</sup> See European Commission: Gigabit Infrastructure Act. ("Achieving the targets set out in Decision (EU) 2022/2481 requires that, by 2030, all end users at fixed locations be covered by a gigabit network up to the network termination point and all populated areas be covered by next-generation wireless high-speed networks with performance at least equivalent to that of 5G, in accordance with the principle of technological neutrality.")

<sup>24</sup> See paragraph 1.(2)(a) of Article 4 (Digital Targets), Decision (EU) 2022/2481 of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme 2030 (Text with EEA relevance), 19 December 2022. ("all end users at a fixed location are covered by a gigabit network up to the network termination point, and all populated areas are covered by next-generation wireless high-speed networks with performance at least equivalent to that of 5G, in accordance with the principle of technological neutrality").

<sup>25</sup> See Plum Consulting: Wi-Fi Spectrum requirements, 25 March 2024, <https://plumconsulting.co.uk/wi-fi-spectrum-requirements/#:~:text=To%20ensure%20whole%2Dbuilding%20coverage.of%20Wi%2DFi%20in%20Europe> [accessed: 9 August 2024]

139 **III.2) Provide information about use cases, expected deployments (e.g. number of BS for**  
140 **MFCN) and timeframe**

141  
142 Authorizing the entire 6 GHz band for Wi-Fi is critical in fully enabling latency sensitive high  
143 throughput applications like real-time XR for health, education and gaming, robotics, and  
144 industrial automation and sensory. In particular, this is critical in enabling relevant applications  
145 in dense residential environments in addition to scaling of applications in enterprise and industrial  
146 deployments when multiple of these application sessions have to be supported simultaneously and  
147 in close proximity. With access to 320 MHz channels, Wi-Fi devices can build upon IEEE Std.  
148 802.11az-2023 to offer sub-1 meter positioning accuracy, which results in new innovative use  
149 cases such as micro-targeting for retail and warehouse asset tracking.

150  
151 The availability of a large number of channels at various channel widths (from 20 MHz to 320  
152 MHz) is facilitating more modular and flexible deployments that allow scaled operation of services  
153 in the above mentioned target industries. Some examples<sup>26</sup> include multi-layer operation, service  
154 segmentation and prioritization, context-aware wireless networks, and hyper-aware access point  
155 deployments. Highly secure communication with WPA3 security<sup>27</sup>, which is being now mandated  
156 for Wi-Fi devices operating in the 6 GHz band, further enhances these services and addresses new  
157 uses cases as well.

158  
159 **IV) Provide information about standardization and technology impact**

160  
161 In January 2024, Wi-Fi Alliance introduced<sup>28</sup> Wi-Fi CERTIFIED 7™ based on IEEE P802.11be  
162 technology. With the introduction of 320 MHz channel bandwidth, Wi-Fi 7 doubles throughputs  
163 relative to Wi-Fi 6E and significantly improves latency for XR through enablement of MLO over  
164 multiple bands, namely 2.4 GHz, 5 GHz, and 6 GHz bands. Wi-Fi 7 also provides higher  
165 efficiency, relative to Wi-Fi 6E, through offering of 4096 QAM. In addition, spectrum puncturing  
166 improves flexibility in utilizing spectrally efficient wide channel bandwidth, e.g., 160 MHz and  
167 320 MHz, while protecting incumbent operation in the band.

168  
169 With Wi-Fi 7 products already in the market, Wi-Fi deployments are going through another  
170 generation upgrade in the entire 6 GHz band globally<sup>29</sup>. It is believed that the majority of Wi-Fi  
171 6E and Wi-Fi 7 devices already support the entire 1200 MHz bandwidth in the hardware, cost the  
172 same price, and use the same energy regardless of whether they operate on either 480 MHz or 1200  
173 MHz in the 6 GHz band. By authorizing the upper 6 GHz band for licensed-exempt usage in  
174 Europe, Wi-Fi devices can have access to the entire 1200 MHz of spectrum and deliver more than  
175 2.5 times capacity with higher spectrum efficiency than with 480 MHz allocation.

176  
177 In November 2023, the IEEE 802.11 Working Group approved the creation of a new project,  
178 P802.11bn<sup>30</sup>, to work on a major amendment, entitled “Enhancements for Ultra High Reliability”  
179 for next generation wireless LAN that applies to carrier frequency operation between 1 GHz and

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<sup>26</sup> Selected examples of frequency-band-agnostic new services and architectures include smart automation facilities (<https://community.hpe.com/t5/networking/hyper-aware-facilities-will-drive-the-future-of-smart-automation/ba-p/7219007>) and hyper-aware smart buildings ([https://www.arubanetworks.com/assets/wp/WP\\_Smart-Buildings.pdf](https://www.arubanetworks.com/assets/wp/WP_Smart-Buildings.pdf)) [accessed: 9 August 2024]

<sup>27</sup> See Wi-Fi Alliance: Discovery Wi-Fi Security, <https://www.wi-fi.org/discover-wi-fi/security> [accessed: 9 August 2024] (“WPA3 is a mandatory certification for Wi-Fi CERTIFIED™ devices.”)

<sup>28</sup> See Wi-Fi Alliance: Wi-Fi Alliance® introduces Wi-Fi CERTIFIED 7™, <https://www.wi-fi.org/news-events/newsroom/wi-fi-alliance-introduces-wi-fi-certified-7> [accessed: 9 August 2024].

<sup>29</sup> See Wi-Fi Alliance: Wi-Fi 7 market momentum: Wi-Fi 7 is here – is your network ready?, <https://www.wi-fi.org/beacon/chris-hinsz/wi-fi-7-market-momentum-wi-fi-7-is-here-is-your-network-ready> [accessed: 9 August 2024].

<sup>30</sup> See IEEE P802.11bn, [https://www.ieee802.org/11/Reports/tgbn\\_update.htm](https://www.ieee802.org/11/Reports/tgbn_update.htm) [accessed: 9 August 2024].

180 7.250 GHz. Of note is that backward compatibility and coexistence with legacy IEEE 802.11  
181 devices in the 2.4 GHz, 5 GHz and 6 GHz license-exempt bands will be ensured.  
182  
183 IEEE P802.11bn, which is also known as Wi-Fi 8, targets at increasing medium access control  
184 (MAC) throughput by 25%, improving latency by 25%, and reducing the MAC Protocol Data Unit  
185 (MPDU) loss by 25% relative to IEEE P802.11be. This project also aims to provide a mechanism  
186 to reduce power consumption for access points (APs) (including mobile APs) and improved peer-  
187 to-peer (P2P) operation compared to IEEE P802.11be operation.

**Section B: Ultra wide band (UWB)*****I.1) What are your current and future spectrum needs (before and beyond 2030) in the upper 6 GHz band?***

IEEE 802 LMSC appreciates RSPG’s recognition of UWB technology as a valuable incumbent service in the upper 6 GHz band. The upper 6 GHz band is included in the European UWB regulations’ preferred spectrum for UWB.

UWB devices, as specified in IEEE 802.15 standards, are currently being widely used worldwide in the 6 GHz to 8.5 GHz range for various applications, including communication, measurement, location, imaging, surveillance, and medical systems<sup>31</sup>, providing significant value and utility. These applications often operate in conjunction with other short-range device technologies, enhancing their operation and efficiently sharing spectrum.

The next generation of UWB technology, being developed under IEEE P802.15.4ab<sup>32</sup>, will continue to require access to the upper 6 GHz band. This project builds on IEEE Std 802.15.4z-2020<sup>33</sup>, which utilizes both the 6 GHz and 7 GHz frequency bands. Future developments supported by this project include:

- Improved link budget and reduced air-time
- Enhanced sensing capabilities for presence detection and environment mapping
- Improved accuracy, precision, and reliability for high-integrity ranging
- The use of interference mitigation techniques to support greater device density and higher traffic use cases
- Improved coexistence with other services
- Reduced complexity and power consumption
- Enhanced support for ultra-low power, low latency streaming
- Support for emerging applications such as high-definition audio

The use of UWB is experiencing rapid growth in both economic value and positive social impact. As UWB technology is still in the early, steep area of its growth curve, we anticipate continued expansion of spectrum needs in the upper 6 GHz band before and beyond 2030.

IEEE 802 LMSC emphasizes that UWB technology efficiently uses spectrum in a non-disruptive manner, playing a key role in addressing the increasing scarcity of mid-band spectrum. Its inherent “low impact” nature promotes effective sharing of spectrum for multiple uses and users simultaneously, which is crucial for maximizing the value of available spectrum. So long as new incompatible uses are not introduced into the bands, UWB does not need exclusive access to spectrum.

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<sup>31</sup> See FiRa Consortium: Unleashing the Potential of UWB: Regulatory considerations, August 2022, <https://www.firaconsortium.org/sites/default/files/2022-08/Unleashing-the-Potential-of-UWB-Regulatory-Considerations.pdf> [accessed: 9 August 2024]. (“The introduction of IEEE 802.15 UWB-enabled devices in smartphones and laptops puts forecasts at more than 1 billion devices shipped annually worldwide by 2025.”)

<sup>32</sup> See IEEE P802.15.4ab, <https://www.ieee802.org/15/pub/TG4ab.html> [accessed: 9 August 2024].

<sup>33</sup> “IEEE Standard for Low-Rate Wireless Networks--Amendment 1: Enhanced Ultra Wideband (UWB) Physical Layers (PHYs) and Associated Ranging Techniques,” in IEEE Std 802.15.4z-2020 (Amendment to IEEE Std 802.15.4-2020), vol., no., pp.1-174, 25 Aug. 2020, doi: 10.1109/IEEESTD.2020.9179124.



229 ***1.2) What impact on your service do you expect from the introduction of MFCN and/or***  
230 ***WAS/RLAN in the upper 6 GHz band?***

231

232 The introduction of high-powered MFCN in the upper 6 GHz band is expected to have significant  
233 negative impacts on UWB services. UWB devices operate at extremely low power levels, making  
234 them highly susceptible to interference from higher-power systems.

235

236 UWB presents an extremely small interference footprint due to the extremely low transmit power  
237 used and non-continuous signal characteristics.

238

239 Impulse radio signals are comprised of pulse durations in the order of a nanosecond, typically  
240 transmitted in short bursts with gaps between pulses. UWB power limits are many orders of  
241 magnitude lower than more traditional wireless systems. This view illustrates the potential for a  
242 high-power service like MFCN to render the band unusable for other uses.

243

244 It has been demonstrated that UWB can coexist with Wi-Fi devices, based on IEEE 802.11  
245 standards, effectively when transmit power is reasonable and sufficient separation in space is  
246 provided<sup>34,35</sup>. While the impact of Wi-Fi is significantly greater on UWB than the other way  
247 around, these references show that with reasonable mitigations sharing is possible. For example,  
248 reducing the Wi-Fi power to levels that are sufficient to maintain high throughput at link distances  
249 typical of many deployments significantly improved coexistence. Ongoing work in IEEE 802 is  
250 developing new techniques to improve coexistence performance both ways.

251

252 Wi-Fi devices, based on IEEE 802.11 standards, are widely available indoors, and on all mobile  
253 handsets. The use of Wi-Fi calling is an effective means to extend mobile coverage indoors. This  
254 is far more efficient use of spectrum than increasing mobile base station (or handset) power to  
255 overcome the outdoor-to-indoor losses. Wi-Fi power levels indoors can be much more compatible  
256 with UWB and other uses than increasing base station power to penetrate the building.

257

258 ***1.3) What measures could improve compatibility from your perspective?***

259

260 To improve compatibility between UWB services and potential new services in the upper 6 GHz  
261 band, IEEE 802 LMSC suggest the following measures:

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1. *Encourage “using only what you need” through regulatory incentives:* This can promote  
263 innovation that enables new users to share with existing users and improve the overall ef-  
264 ficiency of spectrum use.

265

2. *Consider Power Limitations:* The use of moderately low power is a proven coexistence  
266 technique. Introduce new allocations and services with transmit power limits that are com-  
267 patible with existing license-exempt uses such as UWB.

268

3. *Consider Time Domain Gaps:* For high-powered transmissions, especially in wide-area  
269 systems like MFCN, implement duty cycle restrictions to provide silent periods during  
270 which UWB can slot its transmissions. This can mitigate the blinding effect of high-pow-  
271 ered signals on UWB receivers.

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<sup>34</sup> See: F. Nabki, *et al.*, “SSBD enabled UWB radio coexistence with Wi-Fi 6e demo,” IEEE 802.15 submission, 15 November 2022, <https://mentor.ieee.org/802.15/dcn/22/15-22-0642-02-04ab-ssbd-enabled-uwb-radio-coexistence-with-wi-fi-6e-demo.pptx> [accessed: 9 August 2024].

<sup>35</sup> See UWB alliance: Ultra-Wideband (UWB) Aggregation and Co-existence of Wi-Fi 6E Operating in the Presence of UWB, 16 May, 2023, <https://uwballiance.org/wp-content/uploads/2023/05/UWBA-Interference-Testing-Report-April-2023-corrected-final.pdf> [accessed: 9 August 2024].

273 By implementing these measures, it may be possible to introduce new services in the upper 6 GHz  
274 band while maintaining the valuable functionality and growth potential of UWB technology.  
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