

November 20, 2022

National Telecommunications and Posts Commission (EETT)
60 Kifisias St.
Maroussi 151 25
Greece

Re: Public Consultation Regarding the Amendment of the Radio Spectrum Terms of Use Regulation

Dear Sir/Madam,

The Dynamic Spectrum Alliance (DSA)¹ respectfully submits these comments in response to the National Telecommunications and Posts Commission (EETT) public consultation on Amendment of the Radio Spectrum Terms of Use Regulation (the Consultation).

The DSA appreciates the opportunity to share our perspectives on this important topic. We support EETT's efforts to explore innovative and increasingly efficient techniques for enabling access to spectrum. The DSA believes that providing new spectrum access options through use of new spectrum management tools will benefit competition, create conditions for innovation, and spur more rapid deployments of new wireless broadband networks and services.

Our comments herein will focus on use of the 6 GHz band for licence-exempt devices, including radio local area networks.

Implementation of EU Decision 2021/1067

The DSA fully supports EETT's proposal to implement EU Decision 2021/1067 on the harmonized use of radio spectrum in the frequency band 5945- 6425 MHz for the implementation of wireless access systems, including radio local area networks (WAS/RLAN). A world-class digital infrastructure requires efficient and effective management of radio spectrum, including the final link that connects the user to access networks. This final link is increasingly realized by wireless connections, and specifically by Wi-Fi connections. According to the Wi-Fi Alliance, there are more than 16 billion Wi-Fi devices in use

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

globally. Millions of consumers and businesses in Greece rely on Wi-Fi and they expect the performance of their Wi-Fi connections to evolve with that offered by access networks.

To ensure that Wi-Fi, or RLAN in general, functions as expected and users enjoy the possibilities brought about by future gigabit networks, a sufficient amount of licence-exempt spectrum must be made available. EETT's proposal to make the 5945- 6425 MHz band available for the latest generation of Wi-Fi technology is a critical first step to ensure that Greek consumers and enterprises alike continue to have access to reliable, high-quality broadband connections.

Licence-Exempt Use of the Entire 6 GHz Band

In addition to implementing the EU Decision on the lower half of the 6 GHz band, the DSA respectfully suggests that EETT:

- (1) Dedicate the upper portion of the 6 GHz band (6425-7125 MHz) for license-exempt use, taking advantage of the full potential of this band; and
- (2) Authorize the three categories of license-exempt devices: Very Low Power (VLP), Low Power Indoor (LPI), and Standard Power (SP) devices under the management of an Automated Frequency Coordination (AFC) system.

Countries worldwide are actively deploying LPI and VLP devices on a licence-exempt, shared basis in the 6 GHz band, leveraging wider channel availability (up to 160 MHz with Wi-Fi 6E) to increase spectrum efficiency while maintaining the ability to share spectrum with incumbents and other licence-exempt deployments. In the future, Wi-Fi 7 will be able to accommodate 320 MHz channels, which will further improve latency, throughput, reliability, and quality of service.

For SP and outdoor operations, AFC systems have been designed to provide channel availability information to licence-exempt devices, while ensuring that incumbent systems, including fixed point-to-point microwave links, are protected from interference. When an authorized and authenticated device queries an AFC for spectrum availability, the AFC assesses which incumbent receivers have the potential to receive excess energy from the licence-exempt device based on its location and potential transmit power. The AFC calculates the maximum transmit power for that device's location on each 6 GHz channel and provides a list of options for the device to select. The device must check in with the AFC daily to determine if any changes to incumbent use of the band have occurred that would alter the channel and transmit power options available to it.

Building on the experience and lessons learned from the use of SAS in the CBRS band, several DSA members have developed AFC systems for the 6 GHz Band and have applied to become AFC system operators in the United States. Just recently, the FCC granted conditional approval to these AFC system applicants. After the upcoming lab and public testing phases of the certification process, we expect the FCC will allow standard power licence-exempt devices to begin using the 6 GHz band in early 2023. DSA anticipates that many of these same AFC system developers will also seek to operate in countries, such as Canada, Brazil, Korea, and Saudi Arabia, that are in the process of finalizing their regulations for licence-exempt access to the 6 GHz Band, including use of an AFC to manage standard power devices.

Authorizing the entire 6 GHz band for licence-exempt use will allow Greek residents and enterprises to benefit from all the Wi-Fi 6E devices commercially available today, and importantly, also allow them to benefit from Wi-Fi 7 products expected to be widely available in 2024. Without sufficient licence-exempt spectrum, there will be less interest in making these products available for the Greek market for early adopters. Importantly, making the 6425-7125 MHz band available for licence-exempt device to share with incumbent users will continue to allow fixed service, fixed satellite service, and other incumbents thrive in the band.

Were the 6425-7125 MHz band to be identified for IMT at WRC-23 and licensed domestically for mobile operations, EETT would have to relocate fixed service links and other incumbent operations to other frequency bands. The clearing and relocation process would take years to complete and create economic disruption to the affected incumbents. The best guess today is that the 6425-7125 MHz band could be cleared and made available for mobile networks operators through auction around 2030. Realistically, the spectrum would not be put into widespread use until almost 10 years from now.

Alternatively, if EETT supports licence-exempt access across the entire 6 GHz band, the economic and societal benefits to Greece can begin accruing as soon as ECC SE45 completes its work in 2024 and the homologation procedures are put in place, as there are currently many commercially Wi-Fi 6E products available today in North America and Asia. The DSA also encourages EETT to support a new work item in WG FM to study the regulatory aspects of making 6425-7125 MHz band available for licence-exempt use. To avoid unnecessary delay, this work item should start as soon as possible and run in parallel to the work item in SE45.

The DSA would like to direct EETT's attention a report produced by LS Telecom and Valdani Vicari & Associati (VVA) entitled "Socio-economic benefit of IMT versus RLAN in the 6425-7125 MHz band in Europe."² The study examined the following three scenarios that presents the technical and economic benefits of utilizing the 6 425 – 7 -125 MHz frequency range:

- (1) Licensed urban and suburban 5G use of the 6 425 – 7 125 MHz (within a national license but omitting macrocell use, which is unlikely to be permitted),
- (2) Local licensed 5G use of the 6 425 – 7 125 MHz band, and
- (3) RLAN use of 5 925 – 6 425 MHz versus use of the entire 5 925 – 7 125 MHz band. The overall conclusions of this study have found that it is more beneficial to Europeans from both a technical and economic perspective to adopt RLAN for use in the 6 425 – 7 125 MHz band.

Conclusion

The DSA appreciates the opportunity to provide input on EETT's Consultation. We believe that the use of spectrum sharing and automated sharing technology can help EETT to reach its goals of ensuring spectrum is used efficiently and effectively, maximizing gains for users as well as for the

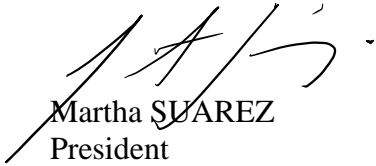
² LS Telecom and Vaidani Vicari & Associates, "Socio-economic benefits of IMT versus RLAN in the 6425-7125 MHz Band in Europe", released 1 August 2022, http://dynamicspectrumalliance.org/wp-content/uploads/2022/08/DSA-IMT-RLAN_64257125MHz-EU_Study-August-2022.pdf

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Greek economy, and facilitating spectrum access by a variety of entities and use cases, including next generation Wi-Fi technology solutions.

Respectfully submitted,



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