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VIA EMAIL (consultation@ectel.int)

RE: Eastern Caribbean Telecommunication Authority Regional Spectrum Management Plan No. 01/2021

The undersigned companies, representing device manufacturers, chipset vendors and applications providers, are pleased to submit these brief comments in response to the public consultation of the Eastern Caribbean Telecommunication Authority (ECTEL) Regional Spectrum Management Plan (the “Plan”).¹ Although the draft Plan covers a range of important topics and proposals, we limit our comments to the objective: “[t]o develop frameworks to ensure that spectrum is made available for new technologies and services.”² Specifically, we respectfully ask the ECTEL Member States to consider making spectrum in the 5925 MHz-7125 MHz (or “6 GHz”) band available for license-exempt use.

In the almost two decades since countries globally implemented the World Radio Conference 2003 decision to open new spectrum in the 5 GHz range to license-exempt devices, there have been revolutionary changes in license-exempt and Wi-Fi technology, use cases, and demand. License-exempt spectrum is a key driver of connectivity, innovation, and economic growth, and it is a critical complement to 5G-based technologies. And the Covid-19 pandemic has brought the significance of license-exempt technologies like Wi-Fi into focus. Making the 6 GHz band available for license-exempt use opens the band to new technologies and services while allowing incumbent services to continue to operate.

Moving forward with making the full 6 GHz band available for license-exempt use is consistent with the International Telecommunication Union’s Mobile designation for this band. Therefore, waiting for the outcome of WRC-23 is unnecessary. ITU Region 2 declined to follow Region 1’s approach (which includes studying the 6425-7025 MHz band for IMT designation under Agenda Item 1.2). And regardless of Agenda Item 1.2 (including the global study of the top 100 MHz in the band),³ these studies do not impact the ability of any country in any ITU Region to allocate the full band for license-exempt use. Indeed, countries in all three ITU Regions have already done so.

¹ ECTEL Regional Spectrum Management Plan No. 01/2021, Consultation Document, available at <https://www.ectel.int/consultation-on-ectel-regional-spectrum-plan/>.

² *Id.* at 1.

³ See ITU-R Preparatory Studies for WRC-23, Agenda Item 1.2 <https://www.itu.int/en/ITU-R/study-groups/rcpm/Pages/wrc-23-studies.aspx>.

In Region 2, the United States,⁴ Brazil,⁵ Canada,⁶ Chile,⁷ Honduras,⁸ Guatemala,⁹ and Costa Rica¹⁰ have also moved forward to make the full band available for license-exempt use. In addition, Mexico and Colombia and others are consulting on the full band.¹¹ And in Regions 1 and 3, Saudi Arabia¹² and Korea¹³ have also made the full band available for license-exempt use. With this global momentum, especially in Region 2, ECTEL Member States would benefit from a broad ecosystem of devices and equipment available in the band. In the United States, equipment for the 6 GHz band has already been certified and is commercially available.

Expanding spectrum availability for license-exempt technologies would bring social and economic benefits to the ECTEL Member States. The Wi-Fi Alliance has published a study showing that the global value of Wi-Fi exceeds \$3.3 trillion today and is expected to reach nearly \$5 trillion in 2025.¹⁴ A key driver of this growth is the allocation of the 6 GHz band for license-exempt use. In addition, the Dynamic Spectrum Alliance has published a number of economic studies showing how the allocation of the 6 GHz band would bring billions of dollars in economic value to economies in Latin America.¹⁵ In ECTEL Member States, additional license-exempt spectrum could help close the digital divide, help connect schools and local businesses and boost industries like tourism.

Thus, we encourage ECTEL Member States to act to make the full 6 GHz band available for license-exempt use.

⁴ https://ecfsapi.fcc.gov/file/0424167164769/FCC-20-51A1_Rcd.pdf.

⁵ Ordinance No. 1306 (26 Feb. 2021)

<https://www.anatel.gov.br/legislacao/atos-de-certificacao-de-produtos/2021/1510-ato-1306>.

⁶ <https://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf11698.html>.

⁷ Republica de Chile, Ministerio de Transportes y Telecomunicaciones, Subsecretaría de Telecomunicaciones Modifica Resolucion N° 1.985 Extenta, de 2017, de la Subsecretaria DE Telecomunicaciones (6 October 2020).

⁸ HND40A (footnote) : Los Sistemas de Acceso Inalámbrico que incluyen las Redes Radioeléctricas de Área Local (Wireless Access Systems/Radio Local Area Network, (WAS/RLAN, por sus siglas en inglés)) cuentan con Licencia General para operar en los rangos de frecuencias 902-928 MHz, 2400-2483.5 MHz, 5150-5250 MHz, 5250-5350 MHz, 5470-5725 MHz, 5725-5850 MHz, 5925-7125 MHz, 24.05-24.25 GHz y 57-71 GHz, cumpliendo con las disposiciones emitidas por CONATEL

⁹ National Footnote GTM-51 updating the National Table of Frequency Allocations (1 Jan 2021) (making 5925-7125 MHz license-exempt).

¹⁰ Costa Rica. Ministerio de Ciencia, Tecnología, y Telecomunicaciones, DECRETO EJECUTIVO N° 42924-MICITT

¹¹

México. Instituto Federal de Telecomunicaciones (IFT), Consulta Pública de Integración del “Cuestionario sobre la banda de frecuencias 5925-7125 MHz;

Colombia: MINTIC y ANE consultan a los interesados sobre los posibles usos de la banda de 6 GHz, <https://www.mintic.gov.co/portal/inicio/Sala-de-Prensa/Noticias/160952:MINTIC-y-ANE-consultan-a-los-interesados-sobre-los-posibles-usos-de-la-banda-de-6-GHz>

¹² <https://www.citc.gov.sa/en/new/publicConsultation/Pages/144207.aspx>

¹³ Ministry of Science and ICT, supplies 6 GHz band as a broadband unlicensed frequency October 16, 2020 (https://www.msit.go.kr/web/msipContents/contentsView.do?cateId=_policycom2&artId=3140715)

¹⁴ “Global Value of Wi-Fi 2021-2025,” Feb. 2021 <https://www.wi-fi.org/discover-wi-fi/value-of-wi-fi>.

¹⁵ <http://dynamicspectrumalliance.org/>

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