

April 20, 2021

Kommunal-og moderniseringsdepartementet
Nasjonal kommunikasjonsmyndighet (Nkom)
Norway
firmapost@nkom.no

Re: Høring av forslag til endringer i fribruksforskriften.

Dear Sir/Madam,

The Dynamic Spectrum Alliance (DSA)¹ appreciates the opportunity to share its comments regarding the Nkom consultation of proposals for changes in the free use of spectrum in Norway (the Consultation).² This Consultation proposes two new applications for wireless data transmission (WAS/RLAN) in the 6 GHz band that will give the Norwegian market access to the latest technology for wireless networks, including Wi-Fi 6E. Furthermore, Nkom proposes to update the regulation for wireless data transmission in the 60 GHz band, enabling use of WiGig and extending the band so it can now be used for fixed outdoor installations, provided that the regulatory requirements for transmit power and minimum antenna gain are met.

DSA applauds Nkom's proposals and is convinced that opening the 6 GHz and 60 GHz frequency bands for new unlicensed devices with the appropriate operating conditions will ensure that widely used unlicensed wireless technology, such as Wi-Fi 6E and WiGig, can deliver the necessary performance for future applications and networks.

DSA comments are presented below. Please do not hesitate to contact me for further discussions or clarifications.

Best regards,


Martha SUAREZ
President,
Dynamic Spectrum Alliance

¹ 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. A full list of Dynamic Spectrum Alliance members is available on the DSA website at the [DSA Website](#).

² "Høring av forslag til endringer i fribruksforskriften" Nkom; <https://www.nkom.no/aktuelt/horing-av-forslag-til-endringer-i-fribruksforskriften>.

DSA COMMENTS

5 GHz Band

DSA supports the proposed text in §11 (the current fourth paragraph that becomes the new eight paragraph 8) regarding in-vehicle use. DSA welcomes the authorization by Nkom of WAS/RLAN operation inside vehicles in the 5150-5250 MHz band. To remove any potential ambiguity, we recommend adjusting the wording so that it is clear that the limit of 40 mW e.i.r.p. applies to in-vehicle WAS/RLAN installations.

6 GHz Band

DSA commends Nkom for the swift implementation of ECC DEC (20)01 and for adopting the technical conditions outlined in that Decision. We note that the ECC will review the limit for out-of-band (OOB) emissions below 5935 MHz from very low power (VLP) WAS/RLAN devices with the aim to relax this limit by 31 December 2024.