

July 11, 2022

Executive Director
Information & Communication Technologies Authority (ICTA)
12th floor The Celicourt, 6 Sir Celicourt Antelme Street
Port Louis 11302, Mauritius
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Re: CTA/CONSULT/01/22.

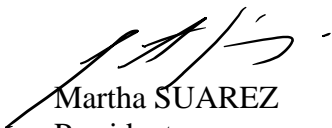
Dear Sir/Madam,

The Dynamic Spectrum Alliance (DSA)¹ appreciates the opportunity to share its comments regarding the ICTA consultation Paper regarding draft decision for allocation of additional spectrum in the frequency range 5945-6425 MHz for broadband wireless access services in Mauritius (the Consultation).² This Consultation proposes two new applications for Wireless Access Systems including Radio Local Area Networks (WAS/RLAN) in the 5945-6425 MHz band that will give access to the latest technology for wireless networks, including Wi-Fi 6E.

DSA concurs with the ICTA's consideration that "*there is a need to make available additional spectrum for the implementation of WAS/RLAN*", and we believe specifically that Wi-Fi will provide users with the gigabit data rates required for many applications such as video conferencing, telemedicine, online education, gaming, and augmented/virtual reality. The COVID19 crisis has vividly demonstrated the importance of more spectrum for fixed connectivity and Wi-Fi.

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 Available at : https://www.icta.mu/documents/2022/06/Consultation_Paper_WIFI_Draft_Decision.pdf.

DSA COMMENTS

DSA commends the ICT Authority for making available the 5945-6425 MHz band for WAS/RLAN.

DSA suggests that the ICTA's Decision on 6 GHz WAS/RLAN should also include some additional text reflecting the following provisions from the EC Decision (EU) 2021/1067 of 17 June 2021 on the harmonised use of radio spectrum in the 5 945-6 425 MHz frequency band for the implementation of wireless access systems including radio local area networks (WAS/RLANs)³: *“Wireless access systems including radio local area networks (WAS/RLAN) are freely established in the frequency band 5945-6425 MHz for this use, subject to compliance with the technical conditions provided for in the annex to this decision.*

No guarantee of protection against interference is given to these systems. In addition, these systems must in no case cause interference to the assigns of the frequency bands concerned under the national table of frequency band allocation.

When introducing new applications into the 5945-6425 MHz frequency band, or into adjacent frequency bands, these applications shall not adopt technical and operational conditions that unduly restrict the continued use of WAS/RLAN in the 5945-6425 MHz frequency band.”

DSA considers the opening of the 5945-6425 MHz band for licence-exempt use by WAS/RLAN an important first step towards achieving a Gigabit Society and Digital Transformation in Mauritius. To accomplish these ambitious goals a performant, affordable, reliable, and scalable local connectivity infrastructure that satisfies the needs of citizen, enterprises, and public institutions alike must be put in place. The technological basis for this infrastructure exists, in the form of Wi-Fi 6E and next-generation Wi-Fi 7. What would be still missing is the right amount of spectrum that will release the full performance of Wi-Fi technology, so we respectfully recommend the ICT Authority to consider making available the 6425-7125 MHz band for WAS/RLAN.

Making sufficient licence-exempt spectrum available for Wi-Fi 6E and Wi-Fi 7 should be an immediate priority for Mauritius, especially considering that prominent economies and digital pioneers around the world such as the US, Canada, Brazil, South Korea, and Saudi Arabia are leading the way towards global harmonisation of the 6 GHz band for licence-exempt use, having already secured the full 6 GHz band (5925-7125 MHz) for WAS/RLAN.

³ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021D1067&from=EN>