

15 July 2023

General Manager

National Communications Authority
Somalia

Re: Response to the NCA consultation on the Strategic Plan 2023-2027

Dear Sir/Madam,

The [Dynamic Spectrum Alliance](#) (DSA)¹ respectfully submits these comments to the public consultation on your Strategic Plan for 2023-2027.

We very much agree with the new vision set out by the Authority to “...establish a competitive ICT marketplace in Somalia that ensures wide availability of ICT services at reasonable prices, facilitates access to public services and resources and enhances educational and social development while facilitating connectivity to all Somali citizens to the rest of the World.”

We note that the NCA is already starting to put these principles into practice in the field of spectrum management, where it is seeking to carefully balance the needs of licensed and licence-exempt use of spectrum.

The administration of Somalia has recently co-signed a contribution to the Arab Spectrum Management Group (ASMG) expressing its preferences with regard to Agenda Item 1.2 of the International Telecommunication Union’s World Radiocommunications Conference 2023 (WRC-23) which will be discussed in November 2023. Our view is that maintaining such a position until the final meeting of the ASMG in September and during WRC will closely align with the priorities set by the Authority.

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 dynamicspectrumalliance.org/members.

The Authority may wish to note that a number of countries with an ambitious digital policy have gone further and opened the entire 6425-7125 MHz band for licence-exempt use. Such countries include Brazil, Canada, Saudi Arabia, South Korea and the United States.

Further, while there is no prospect of the upper 6 GHz band being globally harmonized for IMT, the spectrum could be globally harmonised for licence-exempt technologies. Following a meeting in Mexico City in May, the Inter-American Telecommunication Commission (CITEL) published a proposal for No Change (underlined) to the Table of Frequency Allocations in the band 6425-7125 MHz for all three regions in order to harmonise licence-exempt use of the band. CITEL noted that regulatory harmonisation will create economies of scope and scale and produce a robust equipment market, benefitting consumers and national economies worldwide.

At CEPT's CPG (Conference Preparatory Group for WRC-23) in Greece in late May, it was agreed that if specific conditions are not fulfilled, CEPT would support a No Change (underlined) position with respect to the status of the 6425-7125 MHz band. These conditions include the protection of incumbent services in the band; that WRC-23 should provisionally allocate EESS in 4.2-4.4 GHz and 8.4-8.5 GHz (to be confirmed by WRC-27) in order to address the issue of Sea Surface Temperature Measurements in the 6 GHz band; and, that WRC-23 doesn't initiate studies towards IMT identification at WRC-27 of spectrum in the 7 GHz to 22 GHz range. The CPG meeting resolved that the 6425-7025 MHz band in Region 1 and 7025-7125 MHz band in all regions could be used by any application of the mobile service or of other services to which the band is allocated, and that CEPT is not advocating nor proactively supporting the identification. The final CPG23-9 meeting will be held on 18-22 September 2023.

Two recent studies discuss the advantages of opening the 6 GHz band to licence-exempt use in other parts of the world:

[*Socio-economic benefits of IMT versus RLAN in the 6425-7125 MHz band in Europe.*](#)

This report found that the additional spectrum would bring about capacity and quality of service improvements that will really benefit construction, manufacturing, education and public services.

[*DSA-WhitePaper-How-do-Europeans-connect-to-the-Internet.pdf*](#)
[*\(dynamicspectrumalliance.org\)*](http://dynamicspectrumalliance.org)

This report looks at the comparative efficiency of Wi-Fi compared to mobile for handling data traffic. It notes, for example, that mobile networks in Germany delivered 5.2 GB per Hz of

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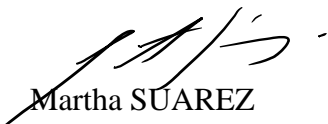


spectrum allocated, while Wi-Fi (operating exclusively in the 2.4 GHz and 5 GHz bands during 2021) delivered approximately 167 GB per Hz.

It would also help Somalia achieve its strategic objectives to deliver universal, efficient and sustainable access to ICT if it were to implement the African Telecommunication Union's recommendation 5 of July 2021 regarding the opening of 5945 to 6425 MHz to licence-exempt use.

The DSA and our members would be delighted to discuss these comments and provide any further information that might be useful to you or to discuss these issues in person.

Kind regards,


Martha SUAREZ
President
Dynamic Spectrum Alliance