

August 31, 2023

Agency for Communication Networks and Services of the Republic of Slovenia  
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**Re: DSA Comments to the Public Consultation on the Authority’s Work Programme for 2024.  
Reference no. 410-1/2023/5.**

Dear Sir/Madam,

The [Dynamic Spectrum Alliance](#) (“DSA”<sup>1</sup>) respectfully submits its comments to the Agency for Communication Networks and Services (“AKOS”) in response to the Public Consultation on the Work Programme for 2024.

The DSA notes that one of the work items AKOS planned is the allocation of frequencies in accordance with the conclusions of WRC-23. DSA notes as well that CEPT’s draft ECP for 6425-7025 MHz in Region 1 and 7025-7125 MHz globally has been submitted for adoption at the ECC’s conference preparatory group (CPG) meeting in Dublin in September.

WRC-23 is an opportunity to help ensure that Wi-Fi can grow and meet the user requirements in terms of traffic, innovative applications, and lower costs through preserving economies of scale for the entire 6 GHz band. With technology neutrality in mind, DSA encourages Slovenian representatives at the CPG meeting to engage with their peers and agree on a common position on agenda item 1.2 of WRC-23 that will allow European states to retain their collective flexibility and sovereignty vis-à-vis third countries regarding the best use of the Upper 6 GHz band. This can be achieved by keeping Europe’s ability to remain outside any International Mobile Telecommunications (IMT) identification.

The DSA believes that retaining this flexibility would be in the best interests of European countries because it will allow them to pursue the most efficient route to affordable nationwide high-speed connectivity while protecting incumbents.

European countries have recently started to study a range of options on the best use of the Upper 6 GHz band, and this activity will only conclude in late 2024 or, more likely, in 2025. DSA and its

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<sup>1</sup> The Dynamic Spectrum Alliance (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 DSA members is available on the DSA’s [website](#).

members will make our contribution to the analysis, and if we can also be of assistance to you in this respect, we would also be delighted to do so.

With access to the full 1180 MHz of the 6 GHz band, Wi-Fi could employ multiple non-overlapping channels of 160 MHz and 320 MHz bandwidth. Access to these wider channels increases spectrum efficiency while maintaining the ability to share spectrum with incumbents and other licence-exempt deployments. Next-generation Wi-Fi, known as Wi-Fi 7, will employ 320 MHz channels to further improve latency, throughput, reliability, and quality of service.

For enterprise applications (such as large public venues, healthcare, education, hospitality, logistics, and manufacturing), more channels and channel widths (from 20 MHz – 320 MHz) will enable performance enhancements and new services and architectures. Examples include multi-layer operation, service segmentation and prioritisation, context-aware wireless networks, and hyper-aware access points. Unlike previous generations of Wi-Fi, Wi-Fi 6/6E and Wi-Fi 7 are based on OFDMA technology, enabling them to achieve very high quality of service (QoS) levels, particularly in managed networks. In other words, Wi-Fi has evolved to a point where it can – with access to sufficient spectrum - address the most demanding enterprise use cases.

We note that a number of countries with an ambitious digital policy have already allocated this bandwidth for licence-exempt use. Such countries include Brazil, Canada, the United States of America, Saudi Arabia and South Korea, among many others.

The DSA has published two studies discussing the advantages of opening the upper 6 GHz band to licence-exempt use:

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

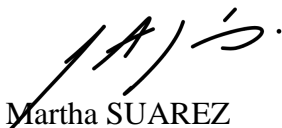
This report found the additional 700 MHz of spectrum would bring about capacity and quality of service improvements that will really benefit construction, manufacturing, education and public services.

- [How do Europeans connect to the Internet](#)

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

The DSA is available to discuss these comments and any additional requirement the AKOS might have. If we can be of any further assistance, please do not hesitate to contact us.

Respectfully submitted,



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President  
Dynamic Spectrum Alliance