



26 June 2023

Object: The EU should retain its sovereignty to decide on the future best use of the upper 6 GHz band to serve the 2030 digital targets (a call to leave the EU outside an eventual IMT identification for Region 1 at WRC-23)

Dear Ambassador,
Dear National Representative,

We, the signatories, representing a broad coalition (including industry associations, equipment manufacturers, chipset vendors, fibre operators, content application services, entertainment, consumer electronics retail, and any remote applications based on Virtual Reality, Augmented Reality, Mixed Reality technologies), convinced of the power of Wi-Fi in conjunction with 5G, fibre, fixed wireless access, and satellite technology to support Europe's Digital Decade 2030 connectivity objectives, would like to insist **on the pivotal role the Council's position for the upcoming World Radiocommunication Conference 2023 ("WRC-23") will have for Europe.**

WRC-23 will be a window of opportunity to align on a global vision for connectivity, to deliver on the existing and future needs of consumers and businesses, and to consider whether to designate the 6 425-7 125 MHz frequency band ("upper 6 GHz band") for International Mobile Telecommunications ("IMT") under its Agenda Item 1.2 or to keep a "no change" ("NOC") position.

The current use of spectrum and the efforts to harmonise its technical conditions deserve the full attention of the EU and national policymakers. Indeed, the WRC-23 decision on the upper 6 GHz band will have critical implications for European consumers and businesses, and for the digital and green transition.

We, the signatories, ask national Governments across the European Union to recognize that the upper part of the 6 GHz band is uniquely suited for WAS/RLANs. With virtually every internet-connected household and business depending on Wi-Fi, sufficient spectrum for WAS/RLAN is critical to deliver gigabit connectivity within the premises, as ambitioned by the 2030 connectivity targets. Furthermore WAS/RLAN is crucial for infrastructure diversity and competition for the benefit of SMEs and consumers.

Contrary to some claims, an IMT identification is not required as a prerequisite to deploy 5G in the future, should the EU decide this is the best use of the band after WRC-23. For example, whilst the 3 600 – 3 800 MHz band, which is a primary European 5G band, is not identified for IMT, this did not keep the EU from using it for 5G deployments. On the contrary, an IMT identification will limit Europe's flexibility to eventually enable WAS/RLAN in the band. As acknowledged by RSPG, an IMT identification is not a neutral label but "a signal for an IMT ecosystem in a frequency band".¹ In the context of intense debates across regions about the future of the full 6 GHz band, accepting an IMT identification for the EU region will signal to other regions and the global nascent Wi-Fi ecosystem that IMT is the favoured model for Europe. Some stakeholders are already picking up this signal.² In this sense, it is worth to underline that there is no precedent that any mid-band spectrum has been allocated to other mobile applications than IMT after being identified for IMT by a WRC.

In addition, "acceptance" by the EU to join an IMT identification would mean deviating from continued harmonisation with leading 5G nations, such as the United States, South Korea, or Saudi Arabia and would thereby deprive consumers and SMEs the benefit of deployment in the EU of low cost 6 GHz Wi-Fi equipment already available and deployed in other countries. Particularly, the initial RSPG proposal to "accept" an IMT identification (without supporting it), would actually defer to other countries of Region 1. Considering that Russia and China have expressed their wish to designate the upper 6 GHz band for IMT, EU's "acceptance" would have the same practical effect as an explicit alignment with these countries and giving up Europe's sovereign decision power.

The only effective way the EU can remain effectively neutral, while the ongoing CEPT studies about coexistence of services in the band are complete and convey that it remains undecided about the best use of the band is to clarify that acceptance of an IMT identification in other regions would not mean entering it for the EU Region. **Therefore, we strongly urge EU Member States, in their discussions on the Council Decision on the EU's position in the WRC-23, to agree on a common position that effectively leaves the EU outside any IMT identification so the EU can fully retain its flexibility and sovereignty vis-à-vis other countries in Region 1 (such as Russia) on the best use of the upper 6 GHz band.**

We remain at your disposal for further information.

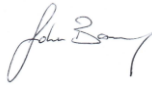
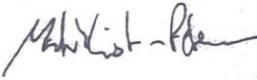
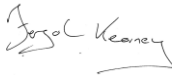









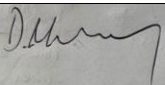
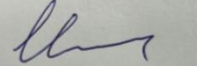

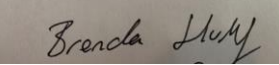


¹ As affirmed in the Radio Spectrum Policy Group (RSPG) Opinion on the ITU-R World Radiocommunication Conference 2023, available [here](#).

² <https://twitter.com/anfr/status/1666096075193856003?s=48>

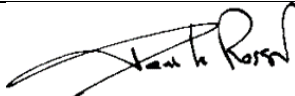
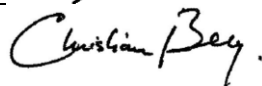
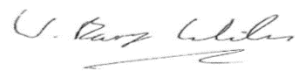






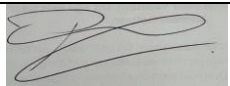
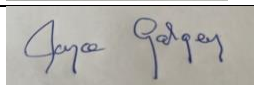
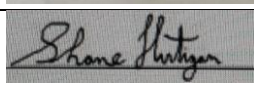


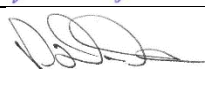
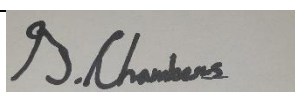
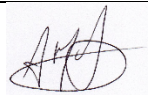
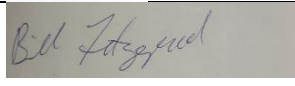
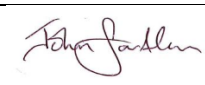


Yours sincerely,

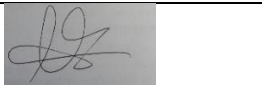
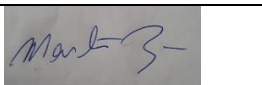
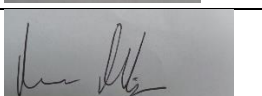
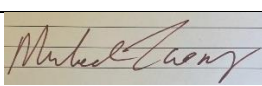
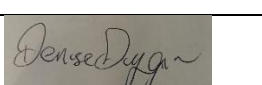
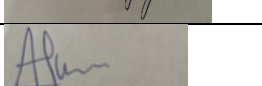
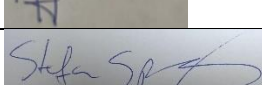
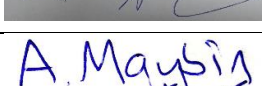

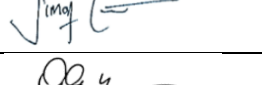

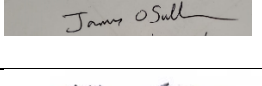

List of signatories (in alphabetical order)

<p>Airwave Internet John Barry CEO</p>	
<p>Airwire Ltd. Martin List-Petersen CTO</p>	
<p>Aptus Ltd. Fergal Kearney CTO</p>	
<p>Associazione Italiana Internet Provider (AIIP) Giovanni Zorzoni President</p>	
<p>AVM Dr Gerd Thiedemann Head of Product Management</p>	
<p>Azotel John O'Hare CEO</p>	
<p>BBNet Stephen Hall COO</p>	
<p>Bluebox Broadband Scott McClelland Managing Director</p>	
<p>Broadband for our Community (B40C) Jim O'Brien Project Manager</p>	
<p>Bundesverband Breitbandkommunikation e.V. / German Broadband Association (BREKO) Sven Knapp Head of Berlin Office</p>	
<p>Cambium Networks Ltd. Nigel King CTO</p>	
<p>Celtic Broadband Jay Perry CEO</p>	
<p>Clearwave Deaglan Moloney Managing Director</p>	
<p>Conway.tv Broadband Chris Conway Director</p>	
<p>Deutsche Glasfaser Ruben Queimano Alonso Chief Commercial Officer</p>	
<p>Digital Forge Brendan Hurley Owner Manager</p>	
<p>Dynamic Spectrum Alliance (DSA) Martha Suarez President</p>	
<p>East Cork Broadband Malcolm Stead Managing Director</p>	



European Consumer Electronics Retail Council (EuCER) Davide Rossi <i>Secretary General</i>	
European Local Fibre Alliance (ELFA) Christian Vonger Berg <i>ELFA Chairperson</i>	
Eurona.ie Barry Wilson <i>Managing Director</i>	
EuroXR Association Patrick Bourdot <i>President</i>	
Fibre Alliance Denmark Thomas Herland Askvold Woldiderich <i>Director</i>	
FMS Internetservice GmbH Patrik Schaub <i>CEO</i>	
FTTH Council Europe Vincent Garnier <i>Director General</i>	
Genexis Group AB Gerlas van den Hoven <i>CEO</i>	
Grifonline Srl. Lorenzo Buzzati <i>Managing Director</i>	
High5! Mischa Peters <i>Managing Director</i>	
HighSpeed Joyce Galgey <i>Managing Director</i>	
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Irish Wireless Ltd. Gurmukh Neote <i>CEO</i>	
Ivertec Ltd. Jimmy Sugrue <i>Managing Director</i>	
Kerry Broadband Paul Dolan Kerry <i>CEO</i>	
Lightnet Broadband Des Chambers <i>CTO</i>	
Mayo Fibre Atlantek Computers Alan McGrath <i>Managing Director</i>	
Munster Wireless Ltd. Bill Fitzgerald <i>Owner</i>	
Net1 John Gartlan <i>CTO</i>	



OneContact Ltd. Michael Cotter CFO / Director	<i>Michael Cotter</i>
OpenBSD Amsterdam Alexandra Peters Director	
Orion Communications Ltd. Martin Ryan Director	
PMIT Solutions Ltd. Darren Philips Managing Director	
Premier Broadband /Alphawave Niall Clancy Managing Director	
RapidBroadband Micheal Twomey Managing Director	
RealBroadband Denise Diggin Co-Founder	
SCC Broadband Ltd. Peter Sweeny Director	
Stefan Sperling Stefan Sperling BSD Wi-Fi Driver Developer	
TIBUS Andrew Maybin Managing Director	
Titania Matthew Ciantar Director	
Video Games Europe (VGE) Simon Little CEO	
Warian Orla McGann Project Manager	
Webbworld Dave Geoghegan Managing Director	
Whizzy Internet James O Sullivan Director	
Wi-Fi Alliance Alex Roytblat Vice President of Regulatory Affairs	
Wireless Broadband Alliance (WBA)* Tiago Rodrigues CEO	
*The signature of this letter represents the view of the majority of the WBA members, nevertheless not all members support all stated positions in this letter.	
Wireless Connect Ltd. Tom Smyth CEO	