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| Date issued: 25 September 2019 | | | | | |
| Source: Wi-Fi Alliance | | | |  | |
| Subject: Wi-Fi Alliance input on the development of the ECC Strategic Plan 2020-2025 | | | | |  |

N

Group membership required to read? (Y/N)

Wi-Fi Alliance is pleased to respond to the call for input on the development of the ECC Strategic Plan 2020-2025[[1]](#footnote-1).

Wi-Fi Alliance® is a global, non-profit industry association of over 800 leading companies from dozens of countries devoted to seamless interoperability. With technology development, market building, and regulatory programs, Wi-Fi Alliance is the organization that enables widespread adoption of Wi-Fi® worldwide by certifying thousands of Wi-Fi products each year. It is also an active participant in international proceedings to, among other things, promote governmental actions that facilitate Wi-Fi connectivity and maximize unlicensed spectrum availability.

In light of the above, Wi-Fi Alliance commends CEPT’s considerations to include RLAN spectrum requirements in the ECC Strategic Plan 2020-2025. Allowing greater access to unlicensed spectrum will spur innovation, social benefits and economic growth across CEPT Members countries. Last year, for example, the global economic value of Wi-Fi alone was estimated to be $1.96 trillion[[2]](#footnote-2).

Wi-Fi Alliance agrees that the ECC Strategic Plan should continue to be a short and focused document and that its current structure is a good basis for the ECC Strategic Plan 2020-2025. Considering the dynamic evolution of mobile data traffic and the corresponding spectrum requirements the idea of a mid-term review of the Plan is supported.

Wi-Fi Alliance is of the opinion that the current “principles”, i.e. spectrum sharing, receiver parameters, and use of higher frequencies remain relevant but need to be updated and adapted to market and societal requirements.

Considering the above, Wi-Fi Alliance proposes the text on the following page to be included in the ECC Strategic Plan 2020-2025 Plan. For reasons of comparability the section numbering of the current ECC Strategic Plan was applied.

**3.1 PRINCIPLES UNDER WHICH THE ECC SHOULD ADDRESS MAJOR CHALLENGES**

**3.1.2 Receiver parameters are part of the overall spectrum efficiency**

The new Radio Equipment Directive requires, amongst others, that radio equipment supports the efficient use of radio spectrum. It is now general practice that performance specifications for radio receivers are formulated in new and revised harmonised standards to support this goal. However, harmonised standards will also need to continue specifying other mechanisms to support spectrum sharing in the future.

Close cooperation between Administrations and industry in setting requirements will be the key to achieving greater spectrum efficiency as new and innovative technologies emerge to support spectrum sharing. The ECC should therefore, in line with the Radio Equipment Directive, endeavour to not only stress the importance of efficient use of spectrum in liaison with standardisation bodies but also to have the results of sharing studies conducted by the ECC incorporated in new and revised harmonised standards.

***Reason: The ECC should ensure that receiver parameters are defined so as to share the burden of sharing and compatibility between incumbents and new entrants and that the introduction of new and innovative technologies is not hindered by the deployment of spectrally inefficient receivers.***

**3.1.4 Securing the availability of high-speed wireless services and applications to consumers, enterprises, and other broadband users**

A Gigabit Society requires broadband connectivity that does not stop at the premises (homes, offices, warehouses, etc.) but is also available inside the premises.

***Reason: Making unlicensed spectrum available has enabled the delivery of wireless broadband services to hundreds of millions of users and generated enormous societal value. In acknowledgment of the significance of unlicensed spectrum the ECC should strive to ensure a fair balance between future licensed and unlicensed spectrum allocations****.*

**3.2 MAJOR TOPICS FOR THE NEXT FIVE YEARS**

**3.2.2 Spectrum for wireless broadband (including 5G and RLAN)**

Adequate and timely availability of unlicensed and licensed spectrum with appropriate regulatory provisions, as well as improved technologies, are essential to support the future growth of mobile broadband systems and achieve the objective of creating a Gigabit Society.

***Reason: The ECC should consider harmonisation of unlicensed and licensed spectrum which is suitable for provisioning indoor and outdoor wireless broadband services and applications.***

High speed cellular and wireless local area networks require broad spectrum and large channel bandwidths to offer improved connectivity, speedier downloads, and the provision of innovative high data rate services and applications to consumers and enterprises. New adaptive technologies might offer viable solutions in the mid-range but also higher frequency ranges than in the conventional frequency bands ranging from some hundred MHz to several GHz. Preferably 5G should be seen in a wider context involving Radio Access Networks other than IMT.

***Reason: The ECC should consider strategic initiatives to support the development of advanced technologies and fair sharing methods related to broadband needs in all frequency ranges, and to obtain contiguous unlicensed and licensed spectrum in substantial blocks.***

1. ECC(19)SP 01 ECC strategic plan\_call for comments\_Aug 19.docx (<https://cept.org/ForumFiles/ecc/6813/2291/ecc-19-sp-01-ecc-strategic-plan_call-for-comments_aug-19docx>) [↑](#footnote-ref-1)
2. *See* Economic Value of Wi-Fi (2018 and 2023). [↑](#footnote-ref-2)