



RESPONSE FROM THE AMERICAN MALAYSIAN CHAMBER OF COMMERCE (AMCHAM)

Malaysian Communications and Multimedia Commission (MCMC) Public Consultation Paper on WLAN in the 6GHz Band

Question	Response
<p>Question 1 MCMC seeks your views and comments on the demand for spectrum for Wi-Fi in the 6 GHz frequency band.</p>	<p>Demand for high-capacity broadband, increasing network densification, and the emergence of new technologies are driving demand for license-exempt spectrum in the full 1200 MHz of the 6 GHz band.</p> <p>Delivery of broadband access is a continuously evolving challenge. Meeting the challenges of broadband deployment today and in the future will require access to quality WLAN services like Wi-Fi, since this is how most people access their broadband network.</p> <p>The last time a significant new allocation of spectrum for WLAN technology was more than a decade-and-a-half ago, following the 2003 World Radiocommunications Conference. This activity opened new bands in the 5 GHz range, which were at that time, optimal for earlier generations of WLAN technology such as Wi-Fi 4, and later, Wi-Fi 5.</p> <p>Since then, the equipment used for broadband networking, use cases, applications, and engineering challenges to meet demand have evolved considerably. The number of devices per user is proliferating.¹ The power of those devices – in processing power, screen resolution, video technology (now at 4k/8k HD), camera</p>

¹ Cisco Internet Report at <https://www.cisco.com/c/en/us/solutions/executive-perspectives/annual-internet-report/air-highlights.html#>

capability, and antenna functionality just to name a few – is growing.² Devices are deployed in increasingly dense residential or enterprise environments, and the broadband networks they connect to, whether wired or wireless, are also greatly improving in throughput and latency. New applications, such as consumer gaming or enterprise Advanced Manufacturing, demand low latency transmissions. An explosion in Augmented Reality/Virtual Reality/Mixed Reality (AR/VR/MR) technology is soon expected to impact everything from how we learn to how we work and play.³ Rural Internet access networks that use Wi-Fi (e.g., as part of a 60 GHz mesh), Wi-Fi at the edge of new low earth orbit satellite constellations, and that use Wi-Fi to connect end-users to 5G networks are also evolving use cases.

Currently, industry has kept up with intense demand by deploying access points (APs) more densely. For example, in schools, manufacturing plants, offices, hospitals, multi-tenant housing and stadiums, these locations rely on license-exempt spectrum for broadband access. As demand has increased, Wi-Fi APs have been deployed more densely, adding more capacity within the same overall network area. In general terms, the coverage area for an enterprise indoor AP has decreased from ~500-1,000 meters² in 2003 to ~250 meters² by 2010, to as little as ~150 meters² today. The practical limit of how densely APs can be deployed has been reached due to the resultant increase in radio frequency interference (both co-channel and adjacent channel). Therefore, the only way to add additional capacity in these situations is through the use of additional spectrum with wider channel bandwidths, which MCMC can enable by opening the full 1200 MHz of the 6 GHz band to license-exempt use.

² In 2007 when the iPhone was introduced, it held between 2,000-8,000 songs, had up to 32 Gbps of memory, and had a 3.5-inch screen size with a resolution of 480 x 320. Today's iPhone 12 ProMax holds up to 128,000 songs, has up to 512 Gbps of memory, has a 6.7-inch screen with a resolution of 2778 x 1284, and has more versatile camera capability, powered by a vastly more powerful processor. <https://www.lifewire.com/compare-iphone-models-1999430>

³ See <https://www.idc.com/getdoc.jsp?containerId=prUS47012020>

Today, the 40 MHz channel sizes that are readily available in the 2.4 GHz and 5 GHz bands are increasingly insufficient to address the steep growth in the number of devices and higher bandwidth requirements per user. A typical two-stream client device can only achieve up to a 574 Mbps data rate when operating in a 40 MHz channel with Wi-Fi 6. When the channel width is increased to 80 MHz or 160 MHz, the data rate is increased to 1.2 Gbps and 2.4 Gbps respectively, fully enabling the “gigabit wireless” era.

Thus, to *retain* the current quality of service for users in the future, 80 MHz channels are required; to *increase* the quality of service, 160 MHz channels are required. With those wide channels, radios can get on and off the air more quickly, delivering the high-bandwidth content that users demand while maintaining the ability to share spectrum with other license-exempt transmitters. The lack of wider channels (e.g., 80 MHz and 160 MHz) would create a detrimental impact on real-time voice and video services, and high-bandwidth immersive services such as AR/VR/MR will be starved of sufficient capacity. This will be most pronounced in dense network topologies (e.g., dense urban areas, enterprises) where these new immersive services are expected to launch first. There is no realistic possibility of delivering multiple 160 MHz wide channels on existing 2.4 GHz and 5 GHz spectrum allocations, which are too fragmented and were optimized for now-outmoded generations of WLANs. In a decade where fiber to the home (“FTTH”) and 10 Gbps DOCSIS will become widely deployed,⁴ and mmWave 5G-NR will provide multi-gigabit FWA services⁵, it is essential that the final Wi-Fi connection to the consumer or business does not become a significant bottleneck. Instead, that connection should provide the throughput, latency, and reliability to support next-generation wireless services. The only way that this will be possible is if 80 MHz, 160 MHz, and 320 MHz channel widths are available for use.

⁴ <https://www.cablelabs.com/10g>

⁵ <https://news.samsung.com/global/samsung-utilizes-5g-mmwave-to-boost-wi-fi-connections-in-subways>

Moreover, to add to the engineering challenge, radios in the 2.4 GHz and 5 GHz bands today consist of multiple generations of equipment with a variety of less spectrally efficient capabilities. This is a design necessity because networks must be able to communicate with older generations of radios. Therefore, technologies like Wi-Fi are always backward compatible with previous generations of Wi-Fi operating in the same frequencies. The additional requirement of interoperability between Wi-Fi generations and the burden of backward compatibility results in further reductions in efficiency that further negatively impact voice and video quality. Wi-Fi 6 in the 6 GHz band (known as Wi-Fi 6E) is not required to interoperate with any previous generation of 6 GHz Wi-Fi technology because it is “greenfield” Wi-Fi spectrum. The 6 GHz band would, for the first time, eliminate outdated and inefficient radio access technology, permitting the far more spectrally efficient Wi-Fi 6E (and above) to operate without the burden of legacy radio interoperability. This will dramatically improve the user experience and spectral efficiency, which can only serve to further the adoption of Wi-Fi technologies.

The 1200 MHz of spectrum in the 6 GHz band on which Wi-Fi 6E would run is the ideal candidate to solve these bandwidth constraint issues. The full 6 GHz band provides a roughly equivalent number of 80 MHz channels as there are 40 MHz channels in the 5 GHz band. For the first time, 80 MHz channel plans would be possible from a “best practices” perspective in dense deployments. Contiguous spectrum would also support seven 160-MHz wide channels and multiple 320-MHz wide channels expected with the next generation of Wi-Fi, which is now going through the IEEE standardization process. With access to the full 6 GHz band, the RLAN industry can continue to play its important role in delivering broadband access, facilitating the Internet of Things, and enriching experiences at work, home, and play.

Looking ahead, Wi-Fi 7, which is currently being standardized in IEEE as 802.11be, relies on access to the greenfield spectrum of the 6 GHz band to deliver its greatest innovations. Among the innovations that are

	<p>currently in draft and/or under discussion are improvements that would make Wi-Fi even more useful to users and applications. While the need for 320 MHz-wide channels has been widely discussed, other innovations are also important. This new generation of technology will operate at 4096 QAM and permit “multi-link operation” that can use the 2.4 GHz, 5 GHz, and 6 GHz spectrum bands simultaneously. Once standards are complete, these improvements will enable lower latency in transmissions, higher throughput, and more deterministic networking capability (e.g., higher reliability or QoS) relative to Wi-Fi 6E. These features provide a step function increase in terms of enabling Wi-Fi to address immersive services with demanding QoS requirements for a larger number and diversity of applications, devices and use cases. In addition, these improvements scale throughput capability to future upgrades in backhaul (e.g., 10G Fiber, DOCSIS 4.0, Fixed Wireless), allowing the RLAN wireless network to evolve with the backhaul. However, if there is insufficient spectrum available to make Wi-Fi 7 capabilities compelling to someone purchasing a new AP, Wi-Fi 7 is not likely to see widespread use in Malaysia.</p>
<p>Question 2 MCMC seeks your views and comments on the emerging technologies utilising the 6 GHz frequency band.</p>	<p>The 6 GHz band, located next to 5 GHz and wide channelization available, is the ideal band for next generation Wi-Fi, Wi-Fi 6E. In addition, other license-exempt technologies like 5G New Radio in Unlicensed Spectrum (5G NR-U) could operate on 6 GHz spectrum.</p> <p>Wi-Fi 6E</p> <p>As noted in response to Question 1, Wi-Fi 6E, the latest generation of Wi-Fi in the 6 GHz band enables faster speeds, more efficient connections for multiple devices, and improved battery life, among other features. Wi-Fi 6E will enable new mobile use cases like augmented reality and virtual reality (AR/VR) wearables and peripherals. These use cases require low latency and high throughput enabled by wide channels (at least 160 MHz) available in the 6 GHz band. And as detailed in response to Question 1, wider channels will support</p>

dense Wi-Fi deployments with the throughput needed to support faster broadband in businesses, schools, apartment buildings and beyond.

Wi-Fi 6E is ready. The IEEE has extended the latest Wi-Fi standard, 802.11ax (also known as “Wi-Fi 6”) to include the 6 GHz band. The standard is complete and has now been published.⁶ In addition to the IEEE standard, Europe’s ETSI BRAN EN 303 687 has reached a “stable draft”,⁷ providing further support for standards-based deployments.⁸

In addition, the Wi-Fi Alliance has announced a certification plan⁹ for global interoperability for January 2021.¹⁰ Interoperability testing has become the hallmark of technologies that use license-exempt spectrum, because it ensures that consumers can purchase devices with the confidence that the device will work with their router and with other devices. According to the announcement, “Multiple product vendors are already announcing Wi-Fi 6E devices that make use of the superwide 160 MHz channels and uncongested bandwidth in 6 GHz to deliver multigigabit, low latency Wi-Fi. Wi-Fi CERTIFIED™ provides a standards-based approach for product vendors to introduce secure and interoperable Wi-Fi 6E products throughout the world, helping to create a diverse device ecosystem.”

⁶ See <https://www.ieee802.org/11/> noting the publication of 802.11ax on 19 May 2021.

⁷ https://portal.etsi.org/webapp/WorkProgram/Report_WorkItem.asp?WKI_ID=58036

⁸ 3GPP-based unlicensed technologies are also in standards development. See 3GPP Technical Specification Group Radio Access Network; NR; User Equipment (UE) radio transmission and reception; Part 1: Range 1 Standalone (Release 16), 3GPP TS 38.101-1 V16.5.0 (2020-09), (NR operating bands in Table 5.2-1 lists NR band class n96 covering the entire 6 GHz band – 5925 to 7125 MHz).

⁹ <https://www.wi-fi.org/news-events/newsroom/wi-fi-alliance-delivers-wi-fi-6e-certification-program>

¹⁰ For more on interoperability testing, see: <https://www.globenewswire.com/news-release/2020/04/23/2021130/0/en/Wi-Fi-Alliance-delivers-more-value-from-Wi-Fi-in-6-GHz.html>

The United States FCC has published its test requirements for 6 GHz,¹¹ and the first devices are already through test review and approval.¹² According to then-FCC Chairman Ajit Pai:

We expect Wi-Fi 6[E] to be over two-and-a-half times faster than the current standard. This will offer better performance for American consumers at a time when homes and businesses are increasingly reliant on Wi-Fi. During the COVID-19 pandemic, we've all seen how Wi-Fi has enabled everything from work-at-home to telehealth to remote learning to streaming and gaming. Wi-Fi 6[E] will turbocharge each of these and more, and will also complement commercial 5G networks. Bottom line: The American consumer's wireless experience is about to be transformed for the better.

With final test rules now available, manufacturers can proceed to test equipment, and Telecommunications Certifications Bodies who receive the test reports prior to the certification application proceeding to the FCC laboratory can also begin their review of manufacturer testing and begin independent testing. A number of successful certifications have occurred, with significantly more expected in 2021. Similarly, in Europe, with the ETSI standard reaching the stable stage, and with the European process now completed, equipment is entering the European market as individual countries complete steps to adopt the European findings into national rules. The Republic of Korea's National Radio Research Institute has announced their revision of the test method for conformity assessment of radio equipment for the 6 GHz band, which includes certification requirements for both LPI and VLP.¹³

¹¹ Knowledge Data Base (KDB) 987594, released Dec. 10, 2020 <https://apps.fcc.gov/oetcf/kdb/forms/FTSsearchResultPage.cfm?id=277034&switch=P>

¹² FCC News Release, "Chairman Pai Statement on Authorization of First 6 GHz Wi-Fi Device," released Dec. 10, 2020 available at <https://docs.fcc.gov/public/attachments/DOC-368593A1.pdf>. Since December 10, 2020, numerous other client devices and an Access Point have received certification.

¹³ Official Gazette No. 19856 (Notification No. 2020-585, No. 2020-586, No. 2020-587 of the Ministry of Science and ICT.

5G NR-U

In addition to Wi-Fi 6E, operators can deploy 3GPP license-exempt technology – 5G NR-U – to extend their networks into unlicensed spectrum.¹⁴ Operators can use a 3GPP platform to take advantage of “free” spectrum while delivering 5G services to their subscribers. NR-U was standardized in 3GPP Release 16 for 5925-7125 MHz and is available today. Importantly, the NR-U and Wi-Fi industry have already been working on coexistence.¹⁵ Technology-neutral rules would allow both technologies in the band.

¹⁴ See CITC at page 51.

¹⁵ No regulatory intervention is required or requested for coexistence. Both license-exempt technologies use spectrum sensing, contention based multiple access, power control and dynamic channel sizing to optimize spectrum usage in an uncoordinated manner. The associated standards already consider the necessary measures to guarantee spectrum sharing. Thus, no additional regulatory measures are necessary to guarantee compatibility between these technologies.

Question 3

MCMC seeks your views and comments on the frequency range within the 6 GHz frequency band that could be considered for Wi-Fi under the Class Assignment in Malaysia. Should MCMC consider allowing Wi-Fi to operate in the entire 1200 MHz (5925 MHz to 7125 MHz frequency band) or only in the 500 MHz (5925 MHz to 6425 MHz frequency band)?

The full 1200 MHz of the 6 GHz band is required for Class Assignment to meet demand for wider channels needed for WLANs to continue to support broadband deployment. Therefore, we recommend MCMC allow Wi-Fi to operate in the entire 5925 MHz to 7195 MHz for the following reasons. First, an allocation of 500 MHz in lieu of the full 5925-7125 MHz is not sufficient to meet this demand for wider channels particularly in dense deployments. Second, global momentum is trending toward making the full band available for license-exempt use. Third, there is an opportunity cost to taking a “wait and see” approach and there is no benefit to an IMT designation in the upper part of the 6 GHz band since this is only 100MHz. Fourth, making the 6 GHz band license-exempt is the best way to support 5G. And fifth, preserving the opportunity for Standard Power deployments (with Automated Frequency Coordination) requires the full band.

1. An allocation of 500 MHz in lieu of the full 6 GHz band is not sufficient.

Where only 500 MHz of 6 GHz spectrum is made available, networks would effectively need to operate in a manner similar to the 5 GHz scenario today. Opening only 500 MHz of the 6 GHz band would require channelization in dense deployments to continue at 40 MHz limiting the capabilities of WLAN technologies). If MCMC decides to allow Wi-Fi in only 500 MHz of the 6 GHz spectrum, users would not be able to take full advantage of the benefits of Wi-Fi 6e, and the brunt of that burden in terms of lesser quality and congestion will fall on users of Wi-Fi in enterprises, schools, transportation hubs, and other public venues.

For consumers, issues will arise as the number of devices in a home continues to multiply. The continued integration of license-exempt technology into consumer durable goods promises that the number of devices in a home will continue to grow e.g., smart televisions that allow user choice in video streaming, connected security devices from video camera doorbells to whole home systems, and smart appliances that allow manufacturers to download new generations of software are examples of the types of capabilities not in existence before the mid-2000s.

Hospitals increasingly rely on video and robotics. Schools at all levels require connectivity to each student's laptop and are seeing increased demands on their wireless networks from security systems to remote learning. Whole industries are transforming how they operate by deeply integrating wireless into their business operations. Globally, machine-to-machine modules will account for 50% (14.7 billion) of all networked devices by 2023, compared to 33% (6.1 billion) in 2018.¹⁶

With a 500 MHz allocation of 6 GHz spectrum, users in Malaysia would fall behind economies that have designated all 1200 MHz. Instead of incremental benefit from new immersive services, users would either lack the ability use these new services or experience a significant degradation in their current experience while trying to enjoy these services. More devices would contend for airtime in the same frequencies as IoT and cloud-based analytics proliferate. Users would have a very mixed experience where applications might work in some locations, such as within certain portions of their home, and might not work well in businesses, public areas, and venues. Inconsistent bandwidth delivery has consequences well beyond consumer unhappiness – it inhibits innovation generally and may even block developers from successfully developing and delivering new applications.

2. Globally, regulators are making the full 6 GHz band available for license-exempt use.

Global momentum has trended toward opening the entire 6 GHz band for license-exempt¹⁷. In 2020, four jurisdictions – the United States, the Republic of Korea, Chile, and Guatemala – took final action to open 5925-7125 MHz to license-exempt use, while many other countries initiated or progressed consultations and studies. Those consultations and studies are now leading a number of jurisdictions to take final action in fully

¹⁶ Cisco Internet Report, Highlights, Devices/Connections and Applications at <https://www.cisco.com/c/en/us/solutions/executive-perspectives/annual-internet-report/air-highlights.html>.

¹⁷ In the context of this submission, the terms “license exempt”, “unlicensed”, “class licence”, and “general user radio license” are equivalent.

opening the spectrum and/or setting technical rules. Notably, in February 2021, Brazil joined the United States Federal Communications Commission (FCC) in opening the entire 5925-7125 MHz band to license-exempt use. Likewise, in March, Saudi Arabia’s Communications and Information Technology Commission (CITC) announced its decision to open the full 6 GHz band to license-exempt use, becoming the first country in Region 1 to do so. Canada’s Innovation, Science and Economic Development (ISED) soon followed in May, announcing that it is opening the full 5925-7125 MHz band as license-exempt. At this time, countries in all three ITU regions have embraced license-exempt use of the full 6 GHz band, with additional decisions expected this year.

Countries opening the full 6 GHz band to license-exempt as of June 2021

Brazil	February 2021
Canada	April 2021
Chile	November 2020
Costa Rica	May 2021
Guatemala	December 2020
Honduras	March 2021
Peru	April 2021
Republic of Korea	October 2020
Kingdom of Saudi Arabia	March 2021
United States	April 2020

In all cases, regulators have articulated compelling rationales for expanding license-exempt spectrum to support their broadband access goals. We advise policymakers to open the full band for several reasons – to

facilitate deployment of new innovative technologies, to improve broadband access and address the digital divide, and to accelerate economic growth. Those benefits are fully achievable with an approach that opens the full 6 GHz band to license-exempt use but would fail or be substantially minimized by an approach based on opening the lower 500 MHz only.

3. The opportunity cost of opening less than the full band to license-exempt WLAN is large and there are uncertain benefits attributable to an IMT designation in Malaysia.

We discourage a “wait and see” approach, where 500 MHz is allocated now, and the balance of the band is allocated sometime in the future. There is an opportunity cost for countries that decide on a staggered approach to spectrum allocation compared to nations that decide to allocate 1200 MHz from the outset. One main drawback is the opportunity cost of impaired use cases and inability to fully meet broadband needs, especially in dense enterprise and urban environments where more than three wideband channels are required. Countries that only designate 500 MHz for license-exempt use will not be able to enjoy the benefits of applications that are built to take advantage of these larger channel sizes. When Wi-Fi 7 standards are completed in about three years, the industry will implement channels up to 320 MHz. Countries that only designate 500 MHz will not be able to enjoy the benefits of applications that are built to take advantage of these channel sizes.

Additionally, many types of equipment are expected to support the entire 1200 MHz of the 6 GHz band as countries like the United States, Brazil, Canada, Saudi Arabia, and the Republic of Korea are enabling the band for such operations, with many others expected in 2021. Due to the need to limit manufacturing and logistical complexity, most 6 GHz equipment will be designed to support the full 1200 MHz, with firmware settings used as necessary to limit operation to the lower 500 MHz. Without the full 1200 MHz available for license-

exempt use, consumers of 6 GHz equipment would not benefit from higher throughput and lower latency but will nevertheless pay for the more complete technology that they are unable to use.

No country has designated any portion of 5925-7125 MHz spectrum for licensed 5G.¹⁸ Therefore, there is an absence of any consensus among the world’s regulators – in contrast to many countries embracing license-exempt use of the full 6 GHz band – that any part of the 6 GHz band is necessary for 5G licensed midband use.

Regulators around the globe agree that withholding the upper 700 MHz of the 6 GHz band for future consideration for licensed 5G technologies is not advisable. For example, Canada’s “ISED is of the view that delaying the release of the spectrum would not meet the policy objectives outlined in section 2, as it would hinder access to affordable broadband services for Canadians in rural and urban areas and would negatively impact the opportunities for innovation.”¹⁹

Waiting for the outcome of WRC-23 is unnecessary – especially in ITU Region 3 where 6425-7025 is not even being considered, and only the top 100 MHz is to be studied for a possible global IMT identification. The 5925-7125 MHz range is already allocated to the mobile service on a primary basis. Therefore, an IMT identification is not necessary and waiting until the end of WRC-23 for a decision will just delay delivery of more advanced license-exempt mobile technologies to the Malaysia market.

With high opportunity cost for failing to open the band to license-exempt WLAN technologies, we strongly recommend to MCMC to open the full 6 GHz band under Class Assignment now to realize a stronger and

¹⁸ There is only an ITU-R study question on coexistence between IMT and incumbent FS and FSS. networks at 6425-7025 MHz (Region 1) and one for 7025-7125 MHz (global). Moreover, Regions 2 and 3 specifically declined to join in on the coexistence study at the WRC-19.

¹⁹ ISED at page 13, para. 40.

more diverse license-exempt ecosystem when 6 GHz applications and services are deployed to benefit the entire nation.

4. License-exempt use is the best way to support both future growth and innovation in 5G through 5G offloading, backhaul, and NR-U.

Regulators globally have also recognized the important and critical role that technologies like Wi-Fi play in furthering the 5G market and cite this as a reason to allocate the 6 GHz band for license-exempt use.²⁰ Spectrum allocations should be sufficient to support both.

License-exempt technologies support 5G in three ways:

- First, license-exempt technologies support a substantial amount of mobile traffic offloads for indoor environments, saving operator capital expenses and conserving licensed mobile spectrum. For the category of mobile device traffic offloaded to Wi-Fi networks, the Asia Pacific region is expected to see 63 exabytes of data per month in 2022, compared to 6.7 exabytes in 2018. Economic studies of the benefits of license-exempt in the 6 GHz band show that operators will save substantial capex and opex costs if Wi-Fi can use the full 6 GHz band to continue its traditional role in offloading mobile data to wired connections.²¹ When Canada opened the 6 GHz band for license-exempt technologies, it stated

²⁰ FCC at page 86, para. 229.

²¹ Wi-Fi Alliance, The Economic Value of Wi-Fi: A Global View, at https://www.wi-fi.org/download.php?file=/sites/default/files/private/The_Economic_Value_of_Wi-Fi-A_Global_View_2021-2025.pdf at pages 411-412.

that it expects offloading of mobile traffic to increase over time,²² which is consistent with more data being consumed inside homes or in indoor business locations.²³

- Second, incumbent microwave uses can remain in the 6 GHz band even after a license-exempt allocation, allowing for microwave links to remain available to support 5G networks. While fiber optic technology would be the expected backhaul technology of choice for 5G, depending on traffic volume, modern microwave links can be deployed as part of a 5G backhaul network. As 5G backhaul needs to grow, more microwave links can be added to the band in support of operator networks; license-exempt technologies will not cause harmful interference to them.²⁴
- Third, operators can deploy 3GPP unlicensed technology – 5G NR-U – to extend their networks into unlicensed spectrum.²⁵ Operators can use a 3GPP platform to take advantage of “free” spectrum while delivering 5G services to their subscribers. NR-U was standardized in 3GPP Release 16 for 5925 7125 MHz and is available today. Importantly, the NR-U and Wi-Fi industry have already been working on coexistence.²⁶ Technology-neutral rules would allow both technologies in the band.

²² ISED at page 12, para 37.

²³ Moreover, the trend in energy-efficient building codes make indoor coverage from outdoor IMT base stations more problematic because energy efficient insulated windows and walls block radio frequencies to a higher degree. As energy efficiency continues to be prioritized, more offloading to indoor Wi-Fi networks should be expected.

²⁴ While RLAN coexistence with microwave backhaul links has been repeatedly proven in regulatory reviews of the 6 GHz band, RLAN coexistence with Fixed Wireless Access has not been studied. FWA and license-exempt are not good candidates for coexistence.

²⁵ See CITC at page 51.

²⁶ No regulatory intervention is required or requested for coexistence. Both license-exempt technologies use spectrum sensing, contention based multiple access, power control and dynamic channel sizing to optimize spectrum usage in an uncoordinated manner. The associated standards already consider the necessary measures to guarantee spectrum sharing. Thus, no additional regulatory measures are necessary to guarantee compatibility between these technologies.

5. Allocating the full band to license-exempt use preserves the opportunity for Standard Power use with Automated Frequency Coordination (AFC).

Another important consideration is preserving the opportunity for Standard Power (higher power and outdoor) with AFC license-exempt operations in the 6 GHz band. Standard Power use cases are particularly important to a number of deployment types, including manufacturing, logistics, agriculture, rural broadband, higher education, hospitality, healthcare, and municipal. Standard Power in the 6 GHz band would operate in conjunction with an AFC geolocation database capability, which is aware of incumbent user operations and can safely authorize Standard Power license-exempt use at a particular location while protecting the incumbents from harmful interference. Because of this requirement to avoid and protect the incumbent services, the frequency ranges or channels that will be available at any particular location will often be only a subset of the overall spectrum that has been allocated for potential Standard Power use by the regulator. Importantly, countries that have either already supported Standard Power or are actively studying it, including the United States, Canada, South Korea, and Saudi Arabia, have all moved to open the entirety of 5925-7125 MHz for license-exempt use in the lower power indoor (LPI) and/or very low power (VLP) modes of operation. This allows for blocking or protecting certain frequencies or channels at particular locations, while still yielding enough wide bandwidth channels to support next-generation RLAN services.

For all of these reasons, we urge the MCMC to move forward with making the full 1200 MHz band available under Class Assignment.

<p>Question 4 MCMC seeks your views and comments on:</p> <ul style="list-style-type: none"> i. the coexistence between Wi-Fi and incumbent services (i.e. fixed service and fixed-satellite service); and ii. the potential interference mitigation between these services. 	<p>With the right regulatory framework, FS and FSS incumbents can continue and grow their primary licensed uses. One important benefit of opening the full 6 GHz band to license-exempt WLAN technologies is that incumbent users are not required to be relocated, and in fact, can grow their network operations over time. The proposed mitigations, such as lower power levels and indoor-only requirements and very low power levels for portable devices will ensure that licensed incumbent operations can continue. Moreover, opening the band to license-exempt technologies will help drive development of new technologies that support shared use.</p> <p>In response to Question 5 below, we provide specific technical operating parameters for three device classes Low Power Indoor (LPI), Very Low Power portable (VLP) and Standard Power with AFC. These device classes incorporate the necessary mitigations to ensure coexistence with incumbent users. These mitigations (power level and indoor use) have been extensively studied in the United States and Europe and have been shown to allow for coexistence.²⁷ ISED further confirmed these coexistence findings made by other jurisdictions. According to Canada’s ISED:</p> <p style="padding-left: 40px;">ISED has performed detailed technical analysis on the coexistence of RLANs with existing users. Furthermore, ISED has reviewed and analyzed various technical studies submitted in other jurisdictions with similar incumbent users. ISED is of the view that, under the proposed licence-</p>
---	---

²⁷ See CEPT Electronic Communications Committee. ECC Report 302, available at <https://docdb.cept.org/download/cc03c766-35f8/ECC%20Report%20302.docx>, ECC Report 316: Sharing studies assessing short-term interference from Wireless Access Systems including Radio Local Area Networks (WAS/RLAN) into Fixed Service in the frequency band 5925-6425 MHz, May 21, 2020, available at <https://www.ecodocdb.dk/download/8951af9e-1932/ECC%20Report%20316.pdf>; and, ECC Decision 20(01): On the harmonised use of the frequency band 5945-6425MHz for Wireless Access Systems including Radio Local Area Networks (WAS/RLAN), Annex 1, A1.2, Nov. 20, 2020, <https://docdb.cept.org/document/16737> (listing technical conditions for LPI and VLP in Europe) (ECC Decision 20(01)).

exempt approach, existing licensed users such as public safety agencies, major telecom operators for backhaul connectivity, satellite service providers and broadcasters will be able to continue to operate and grow in this band.²⁸

Coexistence is essential as it avoids service disruptions and the regulatory uncertainty associated with migrating users to new spectrum. Regulators are right to consider this as a benefit to license-exempt use of the full 6 GHz band.

²⁸ ISED at page 13, para 39. See also FCC at page 9 and para. 19 (“The rules we adopt today are designed to optimize unlicensed access to the 6 GHz band while also protecting incumbent services so that they continue to thrive in the band. In our analysis below, we account for the concerns raised by parties representing the various incumbent services that operate in the 6 GHz band, weigh the various technical studies presented by proponents of unlicensed operations as well as representatives of incumbent services, and address how the rules we are adopting will enable unlicensed operations to operate in the 6 GHz band and protect the various incumbent services that operate in the band.”)

<p>Question 5</p> <p>MCMC seeks your views and comments on the potential technical and operational conditions to be imposed if the 6 GHz frequency band is introduced for Wi-Fi under the Class Assignment. Should part of the frequency band be limited to indoor operation? Should standard power devices operating under the Automatic Frequency Coordination</p>	<p>We support three device classes in the 5925-7125 MHz band: Low Power Indoor (LPI), Very Low Power (VLP) and Standard Power devices with AFC. In the charts below, we provide our joint proposal for technical parameters for WLAN operations in the 6 GHz band for all three device classes.</p> <p>Based on the findings of the comprehensive studies of coexistence between Wi-Fi and incumbent users of the 5925-7125 MHz band conducted in the United States and Europe,²⁹ with specific consideration given to the conditions specified by Ofcom UK³⁰ and the United States FCC,³¹ we recommend the MCMC adopt the following technical conditions for WLAN use of 6 GHz LPI and VLP equipment:</p> <table border="1" data-bbox="842 699 1760 1054"> <tr> <td>Operating band</td> <td colspan="2">5925-7125 MHz</td> </tr> <tr> <td>Device category</td> <td>Low-Power Access Point</td> <td>Very Low Power mobile equipment</td> </tr> <tr> <td>Operating location</td> <td>Indoor only</td> <td>Indoor & Outdoor</td> </tr> <tr> <td>Licensing scheme</td> <td>Class Assignment</td> <td>Class Assignment</td> </tr> <tr> <td>Transmit power (e.i.r.p.)</td> <td>30 dBm</td> <td>17 dBm</td> </tr> </table>	Operating band	5925-7125 MHz		Device category	Low-Power Access Point	Very Low Power mobile equipment	Operating location	Indoor only	Indoor & Outdoor	Licensing scheme	Class Assignment	Class Assignment	Transmit power (e.i.r.p.)	30 dBm	17 dBm
Operating band	5925-7125 MHz															
Device category	Low-Power Access Point	Very Low Power mobile equipment														
Operating location	Indoor only	Indoor & Outdoor														
Licensing scheme	Class Assignment	Class Assignment														
Transmit power (e.i.r.p.)	30 dBm	17 dBm														

²⁹ See CEPT Electronic Communications Committee. ECC Report 302, available at <https://docdb.cept.org/download/cc03c766-35f8/ECC%20Report%20302.docx>, ECC Report 316: Sharing studies assessing short-term interference from Wireless Access Systems including Radio Local Area Networks (WAS/RLAN) into Fixed Service in the frequency band 5925-6425 MHz, May 21, 2020, available at <https://www.ecodocdb.dk/download/8951af9e-1932/ECC%20Report%20316.pdf>; and, ECC Decision 20(01): On the harmonised use of the frequency band 5945-6425MHz for Wireless Access Systems including Radio Local

Area Networks (WAS/RLAN), Annex 1, A1.2, Nov. 20, 2020, <https://docdb.cept.org/document/16737> (listing technical conditions for LPI and VLP in Europe) (ECC Decision 20(01)).

³⁰ Ofcom, *Statement: Improving spectrum access for Wi-Fi*, Statement, 4.51, (July 24, 2020), (<https://www.ofcom.org.uk/consultations-and-statements/category-2/improving-spectrum-access-for-wi-fi>) (confirming that radiated power limits of 25 mW for VLP are “sufficient to manage the risk of interference”).

³¹ *Unlicensed Use of the 6 GHz Band*, Report and Order and Further Notice of Proposed Rulemaking, ET Docket No. 18-295 (Apr. 24, 2020) https://ecfsapi.fcc.gov/file/0424167164769/FCC-20-51A1_Rcd.pdf.

<p>(AFC) system be adopted in Malaysia?</p>	<p>We further invite the MCMC to authorize Standard Power equipment in the 5925-7125 MHz band with AFC to further facilitate sharing with incumbent services at higher power levels for outdoor use. (See also response to Question 6).</p> <table border="1" data-bbox="878 504 1724 807"> <tr> <td>Operating band</td> <td>5925-7125 MHz</td> </tr> <tr> <td>Device category</td> <td>Standard-Power Access Point</td> </tr> <tr> <td>Operating location</td> <td>Indoor & Outdoor</td> </tr> <tr> <td>Licensing scheme</td> <td>Class Assignment</td> </tr> <tr> <td>Transmit power (e.i.r.p.)</td> <td>36 dBm</td> </tr> </table>	Operating band	5925-7125 MHz	Device category	Standard-Power Access Point	Operating location	Indoor & Outdoor	Licensing scheme	Class Assignment	Transmit power (e.i.r.p.)	36 dBm
Operating band	5925-7125 MHz										
Device category	Standard-Power Access Point										
Operating location	Indoor & Outdoor										
Licensing scheme	Class Assignment										
Transmit power (e.i.r.p.)	36 dBm										
<p>Question 6 What other key issues need to be considered in introducing Wi-Fi in the 6 GHz frequency range?</p>	<p>Important benefits will accrue to Malaysia by opening the 5925-7125 MHz band to license-exempt technologies, including how these technologies will help address the digital divide and foster innovation. A recent study commissioned by the Wi-Fi Alliance found that the global value of Wi-Fi is \$3.3 trillion in 2021 and will grow to \$4.9 trillion by 2025.³² The study examined various sources of economic value, including: increased broadband coverage and broadband speeds; reduction of costs by telecommunications providers; deployment of the Internet of Things, AR/VR, municipal Wi-Fi, and free Wi-Fi hotspots; benefits of aligning with other major economies; increased in capacity for cellular offload; and access to Wi-Fi equipment. License-exempt technologies are evolving to meet new demands, and by taking these actions, wireless</p>										

³² Wi-Fi Alliance, Global Value of Wi-Fi, at <https://www.wi-fi.org/discover-wi-fi/value-of-wi-fi> (footnotes omitted, emphasis supplied).

networks and services can provide higher speed, better performance, and improved responsiveness to the new demands of networks and the thousands of devices that will be connected simultaneously to APs.³³

License-exempt technologies are embedded in a wide array of client devices, from laptops to tablets and smartphones, that are part of a highly competitive market that offers consumers a range of choices in device capability and price. As such, WLAN technologies like Wi-Fi have an important role to play in offering low-cost mechanisms for multiple users in a household to connect to the Internet and will be pivotal in realising the government's Jalinan Digital Negara (Jendela) plan.

Wi-Fi is also used to deliver rural broadband in areas where commercial wireline or wireless operators have not deployed. With backhaul spectrum capability such as in 5 GHz, the TV White Spaces, or 60 GHz, Internet services operators can offer broadband connectivity to a household that is served by a Wi-Fi AP within the home. Similarly, satellite broadband connectivity also enables Internet access to a service provider or to a consumer inside the home by using a Wi-Fi AP to reach the end user device. Ample spectrum for license-exempt operations gives both market participants and government new tools to reach the unserved or underserved and can help provide low-cost broadband arrangements.

Opening 5925-7125 MHz for license-exempt use would contribute to global harmonization that is supportive of robust technological innovation. Malaysia would be the latest of the world's economies to open the full 6 GHz band to license-exempt operations, joining Canada, the United States, Brazil, Saudi Arabia, and the Republic of Korea, along with a number of other nations globally. By opening the same spectrum frequencies

³³ Id.

under harmonized rules, Malaysia would help to ensure that manufacturers and innovators can leverage this substantial market opportunity, indirectly driving economic benefits for Malaysia’s electrical and electronics manufacturing sector.

By adopting license-exempt rules for 5925-7125 MHz, MCMC would join a growing group of leading regulators that have similarly concluded that the benefits of license-exempt technologies are important to their national interests.

Canada: “ISED continues to be of the view that releasing the entire 1200 MHz of spectrum will immediately unleash the full potential of the 6 GHz RLAN technology. Moreover, making the full 6 GHz band available for license-exempt use as soon as possible will maximize the social and economic benefits that Canadians will derive from this spectrum... The increased demand for broadband Internet and, consequently, the spectrum required to support Wi-Fi enabled devices and applications for remote working and virtual learning, has been demonstrated over the past year with the COVID-19 pandemic. Notably, current Wi-Fi capacity and speeds are the main constraint, even in homes with high-speed wireline connections, when a family unit is utilizing numerous Wi-Fi enabled devices. This discrepancy will only become more amplified as available wireline speeds increase. The additional license-exempt spectrum will provide the improvements needed in Wi-Fi throughput for homes and businesses and reduce congestion between neighbours living in close proximity. The additional spectrum will also support the ability for small wireless Internet service providers to provide cost-effective enhanced broadband connectivity in rural and remote areas.”³⁴

³⁴ ISED, “Decision on the Technical and Policy Framework for Licence-Exempt Use in the 6 GHz Band,” SMSE-006-21 (May 2021) at page 12, paras. 35-36. [https://www.ic.gc.ca/eic/site/smt-gst.nsf/vwapj/SMSE-014-20-2020-11EN.pdf/\\$file/SMSE-014-20-2020-11EN.pdf](https://www.ic.gc.ca/eic/site/smt-gst.nsf/vwapj/SMSE-014-20-2020-11EN.pdf/$file/SMSE-014-20-2020-11EN.pdf)

Saudi Arabia: “CITC is making the entire 5925 – 7125 MHz band license-exempt in 2021 for the following reasons: 1. Importance of WLAN use in the Kingdom and substantial amount of Wi-Fi traffic, which was exemplified during the COVID-19 lockdowns, and the emergence of a promising device ecosystem that can be taken advantage of starting from 2021 to enable a wide range of innovative digital services.”³⁵

US FCC: “In making broad swaths of 6 GHz band spectrum available for unlicensed use, we envision new innovative technologies and services that will advance the Commission’s goal of making broadband connectivity available to all Americans, especially those in rural and underserved areas. Unlicensed devices operating in this band are expected to work in concert with new licensed 5G services by providing consumers’ ubiquitous connectivity to a full range of services regardless of location. Our actions taken in this Report and Order will help secure U.S. leadership in the next generation of wireless services.”³⁶

We urge MCMC to join with the world’s leading regulators in opening the full 6 GHz band for license-exempt use.

³⁵ CITC, “Spectrum Outlook for Commercial and Innovative Use 2021-3023” (Mar. 2021) at page 51

<https://www.citc.gov.sa/en/mediacenter/pressreleases/PublishingImages/Pages/2021033001/Spectrum%20Outlook%20for%20Commercial%20and%20Innovative%20Use%202021-2023.pdf>

³⁶ FCC, “Unlicensed Use of the 6 GHz Band,” ET Docket No. 18-295 at page 2, para. 1 (Apr. 24, 2020) <https://www.fcc.gov/document/fcc-opens-6-ghz-band-wi-fi-and-other-unlicensed-uses>