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24 Dec 21

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Attn: Senior Telecommunication Engineer (Spectrum Planning) 1

### **6GHz Devices for WLAN Consultation**

We are the Hong Kong Distributor for NETGEAR and in response to the consultation on "Creation of a Class License for Regulating the Use of and Trade in 6 GHz Devices for Wireless Local Area Network and Variation to the Class License for Provision of Public Wireless Local Area Network Services", we have following comments: -

1. The whole 6GHz band is 1200MHz of spectrum (5925 – 7125MHz) which can support 7 x 160MHz non-overlapping channel. The proposed 6GHz usable in Hong Kong only covered 500MHz of spectrum (5925 – 6425MHz) and support only 3 x 160MHz non-overlapping channel. This higher reduced the efficiency of the 6GHz equipment. Releasing entire 6GHz band, restricted maximum power output and use with AFC to prevent interference with existing equipment in upper band is suggested.
2. For Device Class License and certification application, suggest making it simple for traders to apply.

Thanks.

Winco (Pacific) Limited

