

Feedback to OFCA consultation on "Creation of a Class Licence for Regulating the Use of and Trade in 6 GHz Devices for Wireless Local Area Network and Variation to the Class Licence for Provision of Public Wireless Local Area Network Services"

Executive Summary

opportunity to response to the Communications Authority of Hong Kong (CA) public consultation on "Creation of a Class Licence for Regulating the Use of and Trade in 6 GHz Devices for Wireless Local Area Network and Variation to the Class Licence for Provision of Public Wireless Local Area Network Services".

to allow FHSS(Frequency-Hopping Spread Spectrum) equipment in very low power (VLP) outdoor application which is aligned with current regulation in EC, United Kingdom.

poses CA to consider license-exemption for AP (Access Point) device same as Client device.

Proposal

Narrowband (FHSS) usage in 6GHz band outdoor

poses CA to allow FHSS equipment in VLP outdoor application which is aligned with current regulation in EC, United Kingdom.

According to EC Decision - COMMISSION IMPLEMENTING DECISION (EU) 2021/1067, VLP devices allow Narrowband (FHSS) usage together with Wideband usage. VLP Narrowband (FHSS) usage will encourage more innovation of wireless access system applications in 5925-6425 MHz. And ETSI harmonised standard EN 303 687 will cover VLP Narrowband (FHSS) application.

Please refer to VLP regulation comparison among OFCA/CEPT EC/UK, VLP requirements in 6GHz lower band were summarized in this table.

VLP Regulation	OFCA Class License Draft Consultation	EC 6GHz Decision 2021/1067	UK OFCOM IR2030/7/6
Power	14 dBm EIRP	14 dBm EIRP	14 dBm EIRP
Frequency (Width)	5925-6425 MHz	5945-6425 MHz	5925-6425 MHz
Device usage support	WLAN(WiFi-6E) Narrowband is not clear	Wideband RLAN/WAS Narrowband (FHSS)	Wideband RLAN/WAS Narrowband (FHSS)

Note 1: The mean e.i.r.p. refers to the e.i.r.p. during the transmission burst which corresponds to the highest power, if power control is implemented.

Note 2: Narrowband defined as devices operating with channel bandwidth of less than 20MHz. Frequency Hopping mechanism (15 hop channels minimum) for operation with PSD greater than 1dBm/MHz EIRP

License Exempt rather than new Class License for APs.

[REDACTED] so proposes CA to consider license-exemption for AP (Access Point) device same as Client device.

As mentioned in Consultation paragraph 17, SSAC (Radio Spectrum and Technical Standards Advisory Committee) noted that such low power devices should not cause harmful interference to the existing fixed-satellite service.

New class license for 6GHz APs cannot prohibit 6425-7125 MHz while many countries are using 5925-7125 MHz WLAN devices. Eventually, harmonization is positive and better way.

[REDACTED]