

orange™

Orange الخط الخليوي

ص.ب ١٦٨٩ عمان ١١١١٨ الأردن
هاتف: +٩٦٢ ٦٤٦٠ ٦٦٦٦
فاكس: +٩٦٢ ٦٤٦٠ ٦١١١
www.orange.jo

الرقم: 5924 / 11 / 15 / 19 / 6

التاريخ: 2021/11/8

عطوفة الرئيس التنفيذي لهيئة تنظيم قطاع الاتصالات المحترم

الموضوع: إخطار طلب ملاحظات على تعديل تعليمات وشروط

ترخيص وتشغيل شبكات الاتصالات الراديوية المحلية

تحية وبعد،

إشارة إلى إخطار طلب ملاحظات على تعديل تعليمات وشروط ترخيص وتشغيل شبكات الاتصالات الراديوية المحلية (RLAN) المنشور على موقع الهيئة الإلكتروني وتاريخ إصداره (2021/10/12)، نرفق طيه ملاحظات شركتنا على التعليمات المعدلة، أملين أخذها بعين الاعتبار.

وتفضلوا بقبول فائق الاحترام،

المدير التنفيذي للشؤون القانونية والتنظيمية والمصادر والتزويد

علي إبراهيم حرب

شركة البتراء الأردنية للاتصالات المتنقلة - أورانج

Petra Jordanian Mobile Telecommunications Company (Orange Mobile) Comments to the Notice Requesting Comments on the Amendment of Instructions for Licensing and Operation Conditions of Radio Local Access Networks (RLAN)

Orange Mobile welcomes the opportunity to participate in this consultation and shares its views and comments on this matter with the TRC, and hope that our comments are taken into consideration.

1. Orange strongly supports TRC proposal to amend the RLAN Instructions as demonstrated in the above-mentioned Notice Requesting Comments.
2. Orange is certain that the added frequency bands will significantly improve Wi-Fi performance through allowing additional channels and capacity, which consequently enhance customer experience.
3. Orange believes that TRC adopted a very conservative approach by allowing the use of the lower band of 6 GHz (5,925-6,425 MHz) for indoor Wi-Fi at EIRP 23 dBm. Although Orange supports allowing the use of this frequency band for Wi-Fi, it strongly believes that this frequency band should be allowed for indoor Wi-Fi at EIRP 30 dBm due to the following:
 - a. This band frequency is higher than the (5,470-5,725 MHz), thus, its propagation would actually be slightly worse than at (5,470-5,725 MHz). Therefore, Wi-Fi in (5,925-6,425 MHz) with an authorized 23 dBm EIRP would have lower coverage inside building as well as lower capacity than Wi-Fi in the (5,470-5,725 MHz) band. Consequently, we strongly believe that (5,925-6,425 MHz) should have 30 dBm for indoor Wi-Fi similar to the (5,470 – 5,725 MHz) band.
 - b. Regulators limit the RLAN EIRP in this band in order to protect incumbent services (Fixed satellite service and Point-to-point fixed service) from harmful interference. Contrary to the EU, this band is currently not in use in Jordan. Therefore, increasing the EIRP to 30 dBm for indoor usage will not cause any harmful interference.
 - c. Despite the fact that this band is currently used by fixed links and satellites in UK, Ofcom decided to make the lower 6 GHz band (5,925-6,425 MHz) available

- for RLANs for indoor use with EIRP higher than proposed by TRC¹. UAE followed the same approach².
- d. In Qatar, the 6 GHz band has been used for satellite and fixed deployment. However, Qatar is consulting³ on allocating 6 GHz band for indoor Wi-Fi at higher EIRP than proposed by TRC.
 - e. In US, although the 6 GHz is heavily used for fixed service, fixed satellite services, mobile services and radio astronomy; on April 2020, the FCC adopted a Report and Order on use of the 6 GHz band for Wi-Fi and other unlicensed uses⁴. The new rules permit low-power indoor use (e.g. access points in the home) up to 30 dBm, and for standard-power use (e.g. access points in hotspot networks) up to 36 dBm in the (5,925-6,425 MHz) band. KSA is considering following a similar approach, i.e., 30 dBm for indoor Wi-Fi at 6 GHz.
 - f. On the other hand, Orange strongly believes that propagation characteristics should also be considered; the Wi-Fi signal within Jordanian houses suffers from larger attenuation than those of EU houses due to the fact that houses in Jordan are generally wider in area and are entirely composed of cement. Therefore, compared to EU, higher EIRP for indoor must be allowed (30 dBm) to overcome increased attenuation problem and enhances customer experience.
4. Finally, we would like to reiterate our position stipulated in our response to the survey conducted by TRC on December 2020 regarding the use of 6 GHz for Wi-Fi, which is that the upper band of 6 GHz (6,425-7,125 MHz) should not be allowed for Wi-Fi and should be considered for 5G (IMT 2020) in view of the preparation of WRC23 (Agenda Item 1.2); the availability of the (6,425-7,125 MHz) band for 5G could be crucial in the future to face the foreseen exponential growth of mobile internet data consumption.

¹ Ofcom statement: Improving spectrum access for Wi-Fi, Spectrum use in the 5 and 6 GHz bands, 24 July 2020.

² TRA Regulation: Ultra-Wide Band and Short Range Devices, 21 December 2020, <https://www.tra.gov.ae/assets/rJJycAi.pdf.aspx>

³ CRA consultation for the use of RLAN devices over Wi-Fi 6.

⁴ <https://www.fcc.gov/document/fcc-opens-6-ghz-band-wi-fi-and-other-unlicensed-uses-0>