



30th January 2023

Bethuel Nkgadime
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Subject: Apple Response on "NOTICE OF INTENTION TO AMEND ANNEXURE B OF THE RADIO FREQUENCY SPECTRUM AMENDMENT REGULATIONS, 2021"

Dear Mr. Nkgadime,

- 1.1. On behalf of our company, Apple Europe Operations, please see our comments below regarding ICASA's consultation on amendments on Annexure B of the notice.
- 1.2. Thank you in advance for soliciting our comments on this important topic and should ICASA decide to hold a consultative meeting, please let us know. Should you have any queries, please don't hesitate to contact Albert Ntavhaedzi by phone at +2783 288 2644 or by email at dntavhaedzi@apple.com.

2. Comments

- 2.1. Apple welcomes ICASA decision for making the 122-246 GHz range available.
- 2.2. Apple supports ICASA for making the lower part of 6 GHz band (5925-6425 MHz) available under license-exempt regulatory conditions for Wireless Access Systems / Radio Local Area Networks (WAS & RLAN).
- 2.3. Apple does not believe an IMT identification is needed in any part of the entire 6 GHz band, 5925-7125 MHz as this would deny businesses and citizens the benefits of next generation of Wi-Fi technologies.
- 2.4. While efforts are underway in the World Radiocommunications Conference 2023 (WRC-2023) Agenda Item 1.2, on a possible IMT identification in the upper 6 GHz band (6425-7125 MHz), we see this as a parallel activity and should not impede Administrations making some or all of the 1200 MHz available under a license-exempt regulatory regime.
- 2.5. Apple believes that new generations of Wireless Access Systems / Radio Local Area Networks need to be added to supplement the 2.4 GHz and 5 GHz bands and it is imperative to allow Wi-Fi 6E in the full 6 GHz band (5925-7125 MHz) since it is predominately only the 6 GHz band that can accommodate wider channel bandwidths which will deliver new applications and



services including augmented reality (AR), virtual reality (VR), mixed reality (MX), unified communications, 8K video streaming, etc. 6 GHz licence-exempt ecosystem must include as a minimum Low Power Indoor (LPI) and Very Low Power (VLP) portable indoor and outdoor battery-operated devices, to make this a reality. Furthermore, much of the innovation in Wi-Fi 7 is based on access to the entire 6 GHz band since 320 MHz channels are expected to be commonplace.

- 2.6. Apple agrees with the inclusion of (EU) 2021/1067¹, the commission implementation of the ECC Decision² on the harmonised use of the frequency band 5945-6425 MHz for Wireless Access Systems including Radio Local Area Networks (WAS/RLAN). Noting, in particular, the permitted power levels for Indoor Low Power Indoor (LPI) and Indoor and Outdoor Very Low Power (VLP) devices.

Note 1: [Commission Implementing Decision \(EU\) 2021/1067 "On the harmonised use of radio spectrum in the 5945 - 6425MHz frequency band for the implementation of wireless access systems including radio local area networks \(WAS/RLANs\)" published on 17 June 2021](#)

Note 2: [ECC Decision \(20\)01 published November 2020 "On the harmonised use of the frequency band 5945 - 6425 MHz" for Wireless Access Systems including Radio Local Area Networks \(WAS/RLAN\)](#)