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September 22, 2022

Shri K Rajaraman, IAS Secretary, Department of Telecommunications Sanchar Bhawan New Delhi-110001

Dear Sir,

Thanks for your kind participation as our chief guest at the National Workshop on **Spectrum and Regulatory Issues in preparation for WRC-23 with "Focus on LEO and GEO satellites issues and Wi-Fi in 6 GHz band".** During the discussions, it was noted that DOT would set up an internal group to consider delicensing of 6 GHz band for Wi-Fi6e for indoor usage to promote innovation and exports. This will substantially increase the utilisation of this band, in addition to the current Satellite services as well as fixed point to point links.

Internet has become a life-line for connecting people when social distancing/physical isolation has become imperative due to global pandemic caused by the COVID19 menace. Wi-Fi already carries more than half of the Internet's traffic and offloading mobile data traffic to Wi-Fi was critical support for our mobile cellular networks from being overwhelmed during the COVID-19 pandemic. Wi-Fi networks in India are getting choked due to limited unlicensed spectrum, particularly because of the high population density and overwhelming dependence on Wi-Fi

Therefore, the Government needs to make more unlicensed spectrum available for Wi-Fi. Countries including the US, Canada, Brazil, Chile, South Korea, Mexico and Saudi Arabia have already delicensed the new 6GHz Wi-Fi. In addition, several countries in the EU have also delicensed the lower part of 6 GHz band. The delicensing of the 6 GHz band around the world is continuing and India should not lag behind in this important technology innovation.

Delicensing of spectrum is the most transparent and equitable way of spectrum allocations and is fully in alignment with the Hon'ble Supreme court judgement in the 2G case.

Delicensing of 6GHz will open new opportunities for innovators and manufacturers to develop products and technologies and also increase opportunities for smart home and industrial products being manufactured in India for export markets.

6 GHz band is currently extensively used by satellites for up linking of broadcasting channels as well as by VSAT for providing data connectivity. Therefore it will not be possible to use this band for licensed mobile operators. However, as various studies have shown, this band could be shared by indoor-only low-power Wi-fi routers on an opportunistic basis.

Since the band cannot be auctioned, delicensing it for Low Power indoor use will not cause any revenue loss to the Government. On the other hand, this move will add huge economic benefit to the economy and help increase the GDP. In addition, this move will also support, Atamnirbhar India as most of the Wi-Fi routers are fully made in the country.

We therefore seek your support for urgent delicensing of 6GHz band for indoor use.

Bharat B Bhatia, President, ITU-APT Foundation of India (IAFI) Vice Chairman, Asia Pacific, World Wireless Research Forum(WWRF)