

May 4, 2023

Communications, Space and Technology Commission  
Al Nakheel District  
Prince Turki bin Abdul Aziz I street intersection with Iman Saud bin Abdul Aziz Road  
75606 – Riyadh 11588  
Saudi Arabia

[freq.regulations@cst.gov.sa](mailto:freq.regulations@cst.gov.sa)

**Re: National Radio Spectrum Law Project**

Dear CST,

The Dynamic Spectrum Alliance (DSA<sup>1</sup>) respectfully submits these comments in response to the Communications, Space & Tehcnology Commission (CST) Public Consultation on the ‘National Radio Spectrum Law’ in which CST seeks to “meet the current and future demands and needs of the national and business sectors in the Kingdom, enable emerging technologies, and enhance research and innovation; integrate with national privatisation and non-oil revenues policies and making it available for commercial use including use by emerging technologies; promote efficient use of radio spectrum to achieve its economic and social objectives; and align with national policies to support critical and smart infrastructure development for road networks, electricity, and oil and gas, as well as national security policies.”<sup>2</sup>

The DSA commends CST for its efforts to respond to “increased demand for spectrum across all sectors and wireless applications.” We agree with the policies CST has listed in the Public Consultation, including increasing the scope of spectrum sharing, implementing the best technologies to coordinate spectrum use, and providing dynamic access to spectrum through flexible licensing and fees. We further agree that implementation of such policies will lead to better access to spectrum for industrial users that support the Kingdom’s national economy as well as create a positive impact on health, education, research and development.

We also applaud CST’s decision to make 1200 MHz of the 6 GHz band available for Wireless Local Area Networks (WLANs) and CST’s proposal to introduce light licensing across a

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<sup>1</sup> The DSA is a global, cross-industry, not for profit organization advocating for laws, regulations, and economic best practices that will lead to more efficient utilization of spectrum, fostering innovation and affordable connectivity for all. Our membership spans multinationals, small-and medium-sized enterprises, as well as academic, research and other organizations from around the world all working to create innovative solutions that will benefit consumers and businesses alike by making spectrum abundant through dynamic spectrum sharing. A full list of DSA members is available on the DSA’s website at [www.dynamicspectrumalliance.org/members](http://www.dynamicspectrumalliance.org/members).

<sup>2</sup> Available at <https://regulations.citc.gov.sa/en/Pages/PublishedPublicConsultations.aspx#/PublishedPublicConsultationDetails/39>.

number of frequency bands. These decisions will improve spectrum utilization and will more importantly stimulate innovation and economic growth across the Kingdom.

The DSA appreciates the opportunity to provide comments on the National Radio Spectrum Law and looks forward to continuing our collaboration with CST to bring the benefits of light licensing and automated shared spectrum technology to the Kingdom, which will benefit competition, create conditions for innovation, and spur more rapid deployments of new broadband networks and services.

Respectfully submitted,



Dr. Martha SUAREZ  
President  
Dynamic Spectrum Alliance