Dynamic Spectrum Alliance Limited
http://www.dynamicspectrumalliance.org

GENERAL INFORMATION

Title and date of the consultation:

Draft Consultation on the decision of the BIPT Council on radio interfaces for short-range equipment / October 3, 2025

To (natural persons designated as contact persons within BIPT in the document that is submitted for consultation):

Philippe Appeldoorn

Enter your name here if you are responding as a private person:

Enter the name of the legal person responding here:

Martha Suárez

Enter your name here if you are acting as the point of contact for the legal person mentioned above:

CONFIDENTIALITY OF THE DATA

The following information is considered to be confidential by the respondent (tick off what is applicable)a:

- Nihil ☐
- The identity of the private person answering ☐
- The identity of the legal person answering ☐
- The identity of the natural person acting as contact person for the legal person mentioned above ☐
- Certain parts of the answer ☐

In the latter case the respondent needs to provide a public and confidential version of his contribution. In the confidential version the confidential parts shall be identified in the body of the text.

In case of conflicts between this form and a statement in the answer (in particular the standard mention regarding confidentiality in e-mails), the respondent recognises that BIPT only needs to take into account this form.

WARNING

In conformity with Article 140 of the Act of 13 June 2005 on electronic communications, the draft decisions of BIPT that could have considerable consequences for a relevant market, are submitted for public consultation. The results thereof have to be published, in conformity with the rules regarding the confidentiality of corporate data.
It is therefore in the interest of the respondent to provide for an exhaustive and accurate list of the confidential information in order to avoid that information from being made public in the context of the publication of the results of the public consultation.
The respondents shall, however, only mark as confidential that information that is truly confidential as
BIPT has the possibility to contest the confidential nature of the information by virtue of Article 23, § 3, of the Act of 17 January 2003 on the status of the regulator of the Belgian postal and telecommunications sectors.

DATE AND SIGNATURE

October 3, 2025

Dynamic Spectrum Alliance Limited
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October 3, 2025

Belgisch Instituut voor postdiensten en telecommunicatie (BIPT)
Koning Albert II-laan 32 bus 10
1000 Brussel, Belgium

Re: Draft Consultation on the decision of the BIPT Council on radio interfaces for short-range equipment

Dear Sir/Madam,

The Dynamic Spectrum Alliance[1] welcomes Belgium's initiative to open the 5945–6425 MHz band for licence-exempt use in response to the draft B03-08 decision on radio interfaces for short-range equipment, including Wi-Fi. While Belgium's 2021 BIPT decision technically adopted both Low Power Indoor (LPI) and Very Low Power (VLP) operations for Wi-Fi 6E in this band, the ongoing consultation currently focuses on permitting licence-exempt access under VLP conditions only. The DSA strongly encourages Belgium to include LPI access consistent with prevailing European practices and international frameworks. Allowing LPI devices would enhance indoor coverage, improve spectral efficiency, and support a wider range of high-demand use cases in enterprise, industrial, and dense urban environments. The lower 6 GHz band is already harmonised across the European Union under Commission Implementing Decision (EU) 2021/1067, with rapid adoption demonstrating its critical contribution to enhanced wireless capacity and improved connectivity outcomes. However, limiting licence-exempt access in Belgium to VLP only constrains the potential for broader indoor coverage and high-density deployments that LPI enables. Aligning Belgium's regulatory framework with international best practices, which include LPI, will better support evolving consumer and enterprise use cases.

Furthermore, the DSA urges Belgium to extend this framework to encompass the entire 6 GHz band (5945–7125 MHz) to fully realise the technical and economic benefits of next-generation wireless technologies. This harmonised approach will simplify regulatory processes, align Belgium with a growing global equipment ecosystem, and maximise the band's utilisation for cutting-edge Wi-Fi services.

Access to the full 6 GHz band is essential to accommodate wide channel bandwidths—up to 320 MHz—required by Wi-Fi 7 and emerging standards such as Wi-Fi 8. This bandwidth enables ultra-high speeds, ultra-low latency, and reliable performance needed for advanced applications including augmented/virtual reality, telemedicine, and industrial automation.

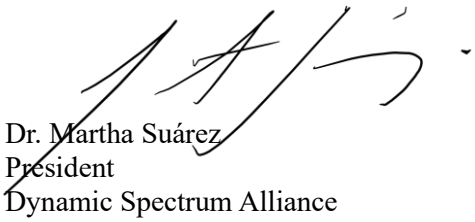
A harmonised and comprehensive approach not only facilitates regulatory simplicity and cross-border interoperability but also positions Belgium within a global ecosystem of compatible devices and

[1]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: https://www.dynamicspectrumalliance.org/members

network equipment. This alignment is vital to driving innovation, digital inclusion, and economic growth in line with the EU's Digital Decade objectives.

The DSA remains committed to supporting Belgium's efforts in establishing a technically sound and harmonised spectrum framework that balances the introduction of innovative wireless services with incumbent safeguarding. We welcome ongoing engagement and stand ready to provide technical expertise, deployment insights, and stakeholder perspectives to contribute to a sustainable and future-proof regulatory environment for the upper 6 GHz band.

Sincerely,



Dr. Martha Suárez
President
Dynamic Spectrum Alliance

1. Strong Support for Full 6 GHz Wi-Fi (5945–7125 MHz)

The DSA strongly supports Belgium's initiative to open the 5945–6425 MHz band for licence-exempt use, including Wi-Fi, and encourages Belgium to extend this framework to the upper 6 GHz band (6425–7125 MHz). The lower 6 GHz segment is already harmonised across the European Union through Commission Implementing Decision (EU) 2021/1067, and its rapid adoption across Member States underscores its vital role in enhancing wireless capacity and connectivity.

However, Belgium currently permits licence-exempt operation in the lower 6 GHz band under Very Low Power (VLP) conditions only, without accommodating Low Power Indoor (LPI) use. According to the BIPT decision published in October 2021[2], Belgium initially adopted technical rules allowing both LPI and VLP operations for Wi-Fi 6E in the 5945–6425 MHz band, aligning with European harmonisation initiatives. Despite this, the ongoing consultation focuses on VLP operations exclusively. The DSA advocates for the inclusion of LPI access consistent with prevailing practices in other European countries and international frameworks. Allowing LPI devices would enhance indoor coverage and spectral efficiency, supporting a broader range of high-demand use cases in enterprise, industrial, and dense urban environments. This harmonised approach simplifies regulatory processes, aligns Belgium with a growing global equipment ecosystem, and maximises the band's utilisation for next-generation Wi-Fi services.Limiting Wi-Fi access solely to 5945–6425 MHz risks leaving Europe behind global leaders like the United States, Canada, South Korea, and Saudi Arabia, which have opened the entire 6 GHz band under unified conditions for licence-exempt technologies.

Opening the full 6 GHz band (5945–7125 MHz) to Wi-Fi will deliver significant benefits, including:

- **Sufficient contiguous spectrum for Wi-Fi 7 and beyond:** Wide 320 MHz channels are critical for achieving multi-gigabit speeds and ultra-low latency, enabling emerging applications such as augmented and virtual reality, immersive communications, and telemedicine. The full band ensures that sufficient contiguous channels are available at scale across Belgium.
- **A globally harmonised device ecosystem:** Countries worldwide have embraced the entire 6 GHz band for licence-exempt use, promoting a rapidly expanding ecosystem of compatible devices and equipment. Full-band access in Belgium would enable consumers and industries to benefit from economies of scale, interoperability, and accelerated technology deployment.
- **Support for Europe's digital ambitions:** Comprehensive Wi-Fi access in the 6 GHz band will augment broadband capacity and catalyse digital transformation across sectors including industry, education, and healthcare, in alignment with the EU's Digital Decade objectives.
- **Efficient spectrum management and coexistence:** Automated Frequency Coordination (AFC) mechanisms for standard power devices in the upper 6 GHz band ensure coexistence with incumbent services. Meanwhile, LPI and VLP operations provide versatile options for indoor and portable applications while minimising interference risk.

Radio Spectrum Policy Group (RSPG) recently published a Draft Opinion on the Long-term vision for the upper 6 GHz band (6425–7125 MHz). As a global organization committed to advancing spectrum policies that enable innovation and connectivity, the DSA advocates for licence-exempt access to the entire 6 GHz band (5945-7125 MHz) across Europe with the same access conditions for LPI and VLP use as the lower 6 GHz band. This approach will maximize regulatory simplicity, ensure Europe can take advantage of a globally harmonized equipment ecosystem, and position Europe as a leader in next-generation wireless technologies, including Wi-Fi 8.

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[2] https://www.bipt.be/file/cc73d96153bbd5448a56f19d925d05b1379c7f21/a4c281a0fc0406aa42759d438323ec8f8d4bfa26/pb_wifi-6e_2021-10-20.pdf

Recognizing that full-band designation for licence-exempt operations with uniform access conditions across the entire 6 GHz band (5945–7125 MHz) may be challenging due to national regulatory considerations, the DSA recommends that Belgium designate at least 320 MHz of contiguous spectrum within the lower part of the upper 6 GHz band for licence-exempt use. This spectrum should permit both LPI and LP operations under the same access conditions as currently applied in the lower 6 GHz band. This approach would preserve sufficient capacity for a wide variety of local broadband applications while minimizing spectrum fragmentation that could harm spectral efficiency and reduce benefits to consumers and enterprises. Moreover, the DSA encourages Belgium to maintain flexibility to designate additional portions of the upper 6 GHz band for Wireless Access Systems including RLAN (WAS/RLAN) use based on evolving national requirements and market conditions.

Such a balanced and adaptive spectrum strategy would support Belgium's leadership in fostering advanced wireless connectivity, ensuring efficient spectrum use, and driving innovation while accommodating incumbent incumbent services and regulatory priorities.

2. Maximising the Benefits of Licence-Exempt Spectrum

Licence-exempt (unlicensed) spectrum is the cornerstone of connectivity in today's digital society and economy. It provides the foundation for ubiquitous wireless access, driving innovation across consumer, enterprise, industrial and public-sector services. Unlike licensed spectrum, which is restricted to specific operators, licence-exempt bands allow any compliant device to operate, fuelling a diverse ecosystem of innovation and competition.

Wi-Fi plays a central role in connectivity in Europe, accounting for about 90% of total IP traffic and generating enormous economic value[3], serving as the invisible backbone of the internet. It powers home broadband, enterprise connectivity, education, healthcare, transport hubs and industrial facilities. Complementary technologies such as Bluetooth, Zigbee and other short-range standards support billions of IoT devices—from wearables and smart appliances to industrial sensors and medical equipment—creating interdependent networks that enable the digital economy to function at scale.

Economic Impact

- Economic studies show that Wi-Fi contributes over €4.9 trillion annually to global GDP and drives inclusive innovation[4], reflecting its role in enabling productivity, commerce, innovation and connectivity.
- By 2030, the value of Wi-Fi is expected to grow further as Wi-Fi 7 adoption scales, offering multi-gigabit connectivity for enterprises, campus environments, factories and households.
- Licence-exempt spectrum underpins Europe's competitiveness, reducing broadband costs, lowering barriers for ISPs and community networks, and increasing consumer choice in digital services.

Public Policy Benefits

- Digital inclusion: Open access spectrum enables affordable connectivity solutions that reach underserved areas and help bridge the digital divide.
- Innovation and entrepreneurship: The absence of licence fees and administrative barriers makes

[3] https://6ghz.info/wp-content/uploads/2022/09/6-GHz-Infographic-Europe.pdf

[4] https://6ghz.info/wp-content/uploads/2022/02/Global_Economic_Value_of_Wi-Fi_2021-2025_202109-1.pdf

unlicensed spectrum fertile ground for start-ups, SMEs and community-led initiatives, allowing experimentation and deployment at low cost.

- Smart cities and public services: From connected lighting and transport systems to telemedicine and public Wi-Fi hotspots, licence-exempt spectrum supports critical digital infrastructure for cities and municipalities.
- Resilience: Wi-Fi and Bluetooth provide essential fallback and redundancy during emergencies, ensuring continuity of communication when licensed network infrastructure is unavailable.

Regulatory Recommendations for Belgium

To ensure Belgium can maximise the benefits of licence-exempt spectrum within the B03-08 framework, we urge BIPT to:

- Keep regulatory burdens minimal: Adopt light-touch regulation, with simple equipment authorisation and no requirement for individual licensing of unlicensed users, to maintain flexibility and promote rapid innovation.
- Allocate as much licence-exempt spectrum as possible: Expanding capacity in both the lower and upper segments of the 6 GHz band will ensure Belgium meets future demand for high-throughput and low-latency services, including Wi-Fi 7 applications.
- Support advanced industrial and societal use cases: Adequate licence-exempt capacity guarantees Belgium's leadership in emerging applications such as industrial automation, smart manufacturing, AR/VR for collaborative work and education, and highly reliable telemedicine solutions.
- Encourage technology coexistence: Ensure frameworks enable Wi-Fi and other licence-exempt technologies to coexist effectively with incumbent services, maximising efficient use of spectrum while protecting existing deployments.

By sustaining a forward-looking licence-exempt framework in the B03-08, Belgium can unlock long-term economic growth, social inclusion and digital transformation aligned with the EU's Digital Decade objectives.

3. Conclusion

The DSA strongly supports Belgium's efforts to open the 5945–6425 MHz band for licence-exempt Wi-Fi use in the B03-08 provision and urges the extension of this framework to encompass the full 6 GHz band (5945–7125 MHz). Access to the entire 1200 MHz of contiguous spectrum is essential to meet the capacity, latency, and reliability demands of next-generation wireless technologies, including Wi-Fi 7 and emerging Wi-Fi 8 standards.

The inclusion of LPI access in the lower 6 GHz band, alongside already permitted VLP operations, will enhance indoor coverage and network capacity, supporting a broad array of use cases from enterprise deployments to industrial automation. This harmonised approach aligns with international best practices, maximising regulatory simplicity and enabling Belgium to leverage a globally harmonised device ecosystem.

Harmonisation with CEPT, EU, and international standards remains fundamental to facilitating cross-border interoperability, reducing market fragmentation, and accelerating innovation. Licence-exempt spectrum is a foundational resource underpinning digital inclusion, economic growth, and innovation across consumer, enterprise, and public sectors.

By adopting a full-band, harmonised licence-exempt framework with flexible coexistence mechanisms,

Belgium positions itself as a leader in the European digital transformation agenda and safeguards spectrum sustainability for the long term.

The DSA looks forward to continuing its collaboration with Belgian authorities to enable a forward-looking and inclusive wireless policy that benefits all stakeholders.