Dynamic Spectrum Alliance Limited
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DSA
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September 3, 2025

Dr. Aminu Maida
Executive Vice Chairman/CEO
Nigerian Communications Commission
Plot 423, Aguiyi Ironsi Street
Maitama District, Abuja 900271
Federal Capital Territory, Nigeria

Re: Consultation Response on the Draft Regulatory Guidelines for the Use of the Lower 6 GHz (5925–6425 MHz) Band

Dear Nigerian Communications Commission - NCC,

The Dynamic Spectrum Alliance (DSA[1]) respectfully submits these comments in response to the Nigerian Communications Commission (the Commission) '**on the Draft Regulatory Guidelines on the Use of the Lower 6 GHz (5925–6425 MHz) Band**' Consultation (The Consultation) in which the Commission announces the standard of practice for operations in the lower 6 GHz band and provides a framework to guide its usage in Nigeria.

The DSA commends the Commission for its initiative to conduct this public consultation and open the 5925 – 6425 MHz frequency band for new services. The proposed guidelines address the growing demand for Spectrum resources to support high bandwidth, high-speed data, and low latency licenced-exempt applications. Nigeria joins a growing list of countries worldwide that are adopting policies to facilitate access by Wireless Access Systems, including Radio Local Area Networks (WAS/RLAN), to additional spectrum that will support the latest technology for wireless networks, including Wi-Fi 6E and Wi-Fi 7. The DSA supports the Commission's proposed parameters for both RLAN Low Power Indoor (LPI) and Very Low Power (VLP) use and the adoption of internationally recognized standards for devices in the band. We strongly believe increasing spectrum allocations for Wi-Fi devices will enhance the digital infrastructure of Nigeria and enable businesses and consumers to take advantage of next generation wireless connectivity and digital applications.

Additional Comments about the 6425 – 7125 MHz and Standard Power Applications

This consultation does not address it, but if the NCC considers opening the 6425 – 7125 MHz frequency range for WAS/RLANs use in the future, the current Wi-Fi 6E, Wi-Fi 7 and future Wi-Fi 8 standards support 320 MHz wide channels. With wider channels, access points will be able to support extremely high-capacity bandwidths, enabling vital applications for the 21st century.

[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 www.dynamicspectrumalliance.org/members.

In addition to enable LPI and VLP uses, the DSA also encourages the Commission to consider Standard Power device authorization in the 6 GHz band. Standard Power devices propagate farther, enabling greater download and upload speeds on end-user devices. If the Commission wishes to implement standard power applications, the U.S. rules, located in FCC Part 15.407 could be considered a reference. It sets a maximum 36 dBm EIRP and a maximum power spectral density of 23 dBm/MHz. It is worth noting that for outdoor devices, the maximum EIRP is limited to 125 mW (21 dBm) at any elevation angle above 30 degrees as measured from the horizon. Standard Power and outdoor WAS/RLAN devices are able to operate in the 6 GHz band under a spectrum-sharing regime known as Automated Frequency Coordination (AFC). Spectrum sharing is an increasingly used tool by authorities around the world to balance spectrum allocations and ensure new commercial entrants and incumbents can co-exist in a band without harmful interference.

Finally, the DSA would like to highlight that the WRC-23 decisions sought to provide flexibility to different administrations on their best approach to use the 6 GHz band and that, in particular, footnote 5.457E[2] ensured that both Wi-Fi and IMT technologies are both recognized.

The DSA appreciates the opportunity to comment on this public consultation. We look forward to working with the Commission on the next steps and providing any technical information that might be useful.

Respectfully submitted,

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[2] 5.457E The frequency bands 6 425-7 125 MHz in Region 1 and 7 025-7 125 MHz in Region 3 are identified for use by administrations wishing to implement the terrestrial component of International Mobile Telecommunications (IMT). This identification does not preclude the use of these frequency bands by any application of the services to which they are allocated and does not establish priority in the Radio Regulations. Resolution 220 (WRC-23) applies.
The frequency bands are also used for the implementation of wireless access systems (WAS), including radio local area networks (RLANs). (WRC-23)