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

January 6, 2026

Majandus- ja Kommunikatsiooniministeerium
Suur-Ameerika 1
10122 Tallinn

Re: DSA Comments on Draft Amendment to Regulation No. 96 of 7 October 2011 – Conditions for Using Radio Frequencies and Technical Requirements for Radio Equipment Exempt from Frequency Authorisation (TRIS 2025/0555/EE)

Dear Sir/Madam

The Dynamic Spectrum Alliance [1] (DSA) appreciates the opportunity to comment on Estonia's TRIS notification regarding the amendment to Regulation No. 96/2011.

DSA and its members collaborate with regulatory authorities worldwide to promote better broadband connectivity through innovative approaches to spectrum management. These approaches include adopting licensing frameworks that integrate licensed, unlicensed, and license-by-rule access options.

The DSA welcomes the Ministry's alignment with EU legislation and CEPT/ECC decisions, which together provide a framework for licence-exempt radio equipment and support Estonia's broader digital development.

Our comments focus on encouraging the Ministry to enable outdoor broadband data transmission systems in the 5945 – 6425 MHz frequency band, and to extend the authorised operation range of WAS/RLANs up to 7125 MHz, preserving the technical conditions established for lower part of the band. Together, these measures will enable a consistent regulatory approach across the full 6 GHz band.

The DSA remains available to discuss these comments further and to support efforts to advance spectrum sharing for the benefit of Estonia's citizens and businesses.

Sincerely,

Dr. Martha Suárez
President
Dynamic Spectrum Alliance

[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.

1. Outdoor Broadband data transmission systems in the frequency band 5945 – 6425 MHz (6.5 Section of Annex 1)

The DSA respectfully encourages the Ministry to consider and authorise outdoor applications using Automated Frequency Coordination (AFC) Systems.[2] At the European level, the SE-45 working group is developing an ECC report on higher-power WAS/RLAN operation, with up to 4 W e.i.r.p. in the 5945 – 6425 MHz range, to enable dynamically coordinated access in this band. The work aims to define technical conditions for implementing a dynamic coordination function for WAS/RLANs in 5945 – 6425 MHz, going beyond what is currently allowed under ECC Decision (20)01.

AFC is an advanced, database-driven coordination system that enables Standard Power (SP) devices to operate safely in the 6 GHz band while ensuring robust protection of incumbent services. The AFC system determines spectrum availability in real time by validating the location and technical characteristics of each SP access point and authorizing channels and transmit power levels accordingly.

By adopting AFC, Estonia can:

- ✓ **Expand Last-Mile Broadband Availability:** Enable high-capacity service delivery in rural and peri-urban areas where traditional network deployments may be cost-prohibitive, thereby supporting inclusive digital access across all regions.
- ✓ **Accelerate Smart City and Public Service Innovations:** Support deployment of outdoor, high-performance Wi-Fi essential for municipal connectivity needs, intelligent transportation systems, public safety operations, environmental monitoring, and large-scale IoT infrastructure.
- ✓ **Stimulate Private Sector Investment and Market Growth:** Provide regulatory certainty, interference safeguards, and spectrum access mechanisms needed to encourage investment from internet service providers, enterprises, and equipment manufacturers. This fosters innovation and enables diverse, large-scale deployments across public and private networks.

Moreover, AFC's dynamic coordination mechanism mitigates interference and optimises spectrum utilisation, enabling denser deployments and higher user capacities to support emerging industry verticals and advanced applications.

In summary, enabling SP operations governed by AFC would position Estonia to deploy widespread, resilient, and scalable 6 GHz connectivity. This approach would support socioeconomic development, digital equity, and innovation across all sectors of the Estonian economy.

2. Unlocking the Full 6 GHz Band for Estonia's Digital Future

The 6 GHz band represents a unique and strategically important opportunity to advance Estonia's digital transformation, exceptionally well-suited to meeting rapidly growing demand for high-capacity broadband across residential, enterprise, educational, healthcare, industrial, and public-sector environments.

Globally, many administrations—including the United States, Canada, Saudi Arabia, and South Korea—have already authorised licence-exempt access across the entire 6 GHz band. These decisions have enabled the deployment of Wi-Fi technologies such as Wi-Fi 6E and Wi-Fi 7, accelerated innovation, and delivered significant socio-economic benefits through improved indoor connectivity, enhanced competition and lower consumer costs. These decisions also paves the way for future applications that will need channels of up to 320 MHz of bandwidth.

The DSA strongly encourages the Estonian Ministry to adopt a similarly comprehensive approach by enabling full licence-exempt access to the 5945 – 7125 MHz band.

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[2] https://eccwp.cept.org/default.aspx?groupid=66