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

COVER SHEET FOR RESPONSE TO NCA PUBLIC CONSULTATION ON THE PROPOSAL FOR THE USE OF THE L6GHz BAND FOR WI-FI 6 SERVICES

BASIC DETAILS

Name of respondent: Dr. Martha SUAREZ

Representing (self or organisation/s): Dynamic Spectrum Alliance, DSA

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DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on NCA's website, and I authorise NCA to make use of the information in this response to meet its legal requirements. If I have sent my response by email, NCA can disregard any standard e-mail text about not disclosing email contents and attachments.

Name : Martha SUAREZ

Signed (if hard copy)

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

25 February 2026

National Communications Authority (NCA)
Airport City, Accra, Ghana
engineering@nca.org.gh

Re: PUBLIC CONSULTATION ON THE PROPOSAL FOR THE USE OF THE L6GHz BAND FOR WI-FI 6 SERVICES

Dear Sir/Madam

The Dynamic Spectrum Alliance [1] welcomes the opportunity to submit comments to the National Communications Authority (NCA) in response to its public consultation on the proposed authorisation of Wireless Access Systems / Radio Local Area Networks (WAS/RLAN), including Wi-Fi 6, in the lower 6 GHz band (5925–6425 MHz).

The proposed opening of the lower 6 GHz band represents an important step in strengthening Ghana's connectivity ecosystem, enabling high-capacity, low-latency Wi-Fi services to support residential broadband, enterprise networks, public access, and emerging digital applications. Access to sufficient licence-exempt spectrum is increasingly critical as data demand grows, users expect higher-throughput connectivity, and new applications demand very low latency that requires large bandwidth channels. The 6 GHz band will enable deployments of the latest Wi-Fi generations, such as Wi-Fi 6E and Wi-Fi 7 that are already commercially available.

International regulatory experience demonstrates that WAS/RLAN operations can safely coexist with incumbent fixed and satellite services in the 6 GHz band through appropriate technical and operational conditions, including low-power operation and Automated Frequency Coordination (AFC). These approaches have been successfully implemented in numerous jurisdictions and provide a proven framework for enabling innovation while safeguarding incumbent services.

Through the comments below, the DSA provides evidence-based input and specific suggestions aimed at supporting the NCA's objectives, promoting international harmonisation, and ensuring that Ghana's spectrum framework remains flexible and forward-looking as wireless technologies and use cases continue to evolve.

The DSA appreciates the opportunity to participate in this consultation and looks forward to continued engagement in support of Ghana's digital transformation goals.

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.

DSA COMMENTS TO THE CONSULTATION DOCUMENT

Chapter Number	Section Number	Heading	Comment	Suggestion / Proposed Amendment
1	1.2	The 6 GHz Band	The upper 6 GHz band was identified for International Mobile Telecommunications (IMT) in Region 1 in accordance with Resolution 245 (WRC-19) at the World Radiocommunication Conference 2023 (WRC-23) in Dubai. In parallel, RR footnote 5.457E [2] recognises that these frequency bands are also used for the implementation of wireless access systems (WAS), including radio local area networks (RLANs), leaving Administrations flexibility to authorise both IMT and RLAN under appropriate technical conditions.	In this context, while the DSA supports the NCA's current focus on authorising WAS/RLAN use in the lower 6 GHz band as an important first step, we respectfully encourage the NCA to adopt a flexible and forward-looking framework that preserves the option of extending WAS/RLAN access to the upper 6 GHz band in the future. Such consideration should be guided by international regulatory developments, the maturity of global equipment ecosystems, and proven coexistence mechanisms to ensure both efficiency and protection of incumbent services.
3	-	TECHNICAL CHARACTERISTICS AND OPERATIONAL CONDITIONS	The DSA welcomes the NCA's proposal to authorise WAS/RLAN use in the lower 6 GHz band (5925–6425 MHz) as an important step toward improving indoor connectivity and enabling next-generation Wi-Fi services. International experience demonstrates that access to licence-exempt spectrum in the 6 GHz band is essential to support growing demand for high-capacity, low-	While supporting the initial opening of the lower 6 GHz band, the DSA encourages the NCA to maintain a technology-neutral and forward-looking framework that allows for future consideration of expanded WAS/RLAN access across the full 6 GHz band, subject to appropriate coexistence mechanisms such as low-power operation and AFC, and informed by international regulatory

[2] In RR 5.457E "The frequency bands are also used for the implementation of wireless access systems (WAS), including radio local area networks (RLANs)."

			latency wireless connectivity.	developments and local deployment experience.
3	Table 2	Technical and Operational Conditions for the WAS/RLANS in the 5925–6425 MHz band	The table specifies the mean e.i.r.p. values for Very Low Power (VLP) devices (14 dBm / 25 mW) but omits the Power Spectral Density (PSD) limit. This omission may create ambiguity for manufacturers and service providers, as PSD is a critical parameter for ensuring coexistence with incumbent services and for harmonisation with international standards**.**	The DSA recommends aligning with harmonised technical conditions, such as those developed by the ATU[3] to enhance regulatory consistency, simplify implementation, and foster a robust global ecosystem of interoperable devices and network equipment. For that reason, the DSA respectfully requests the NCA to clearly indicate a maximum mean e.i.r.p. density for in-band emissions.

[3] https://atuuat.africa/wp-content/uploads/2021/08/En_ATU-R-Recommendation-005-0.pdf