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

August 15, 2026

Executive Director Spectrum Affairs
Telecommunications and Digital Government Regulatory Authority (TDRA)
United Arab Emirates
spectrumconsultation@tdra.gov.ae

Re: Public Consultation - UAE Private IMT Networks Enablement Framework

Dear TDRA Spectrum Management Team,

The Dynamic Spectrum Alliance (DSA)[1] respectfully submits these comments in response to the Telecommunications and Digital Government Regulatory Authority (TDRA) Public Consultation on the UAE Private IMT Networks Enablement Framework (PRIMTE-UAE), which provides a comprehensive regulatory basis for the enablement, deployment, and operation of Private IMT Networks within the UAE.

DSA welcomes TDRA's initiative to establish this framework while ensuring the efficient use of spectrum resources. We support the consideration of enterprise needs to foster an innovative and competitive digital ecosystem.

The DSA considers the 3800-4200 MHz band to be a key wireless innovation band, as demonstrated by regulatory approaches in jurisdictions such as the United Kingdom (OFCOM) and South Africa (ICASA). This band has already been opened for private wireless use in many countries around the world. Most administrations have chosen to assign no single technology to this band, thereby enabling the development of new applications and use cases that enhance connectivity in conference and shopping centers, sports venues, and university campuses. In addition, we have seen this band used to help bridge the digital divide in unserved and underserved areas, including through Broadband Fixed Wireless Access (BFWA) rules being developed in the European Union and Australia. To support these diverse use cases, many countries have implemented spectrum sharing frameworks that can accommodate new users and use cases.

TDRA might wish to consider limiting the maximum amount of spectrum assigned to a single network operator at a given location to between 80 and 100 MHz. Such an approach would help ensure that sufficient spectrum remains available for multiple network operators within the same area, fostering competition and ultimately leading to better services at lower costs.

[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

Furthermore, in the international implementations referenced above, regulators have generally adopted a technology-neutral position. This enables the fastest access to existing and future equipment ecosystems while encouraging innovation and market-driven technology choices. A technology-neutral framework is likely to lead to the best utilization of the spectrum, thereby delivering the greatest benefits to users across all sectors.

We do not have comments on all the frequency bands covered by the PRIMTE-UAE framework and have therefore refrained from taking positions on those bands.

Thank you for your time and consideration. We look forward to continuing the dialogue on this important consultation.

Kind regards,

Martha SUAREZ
President
Dynamic Spectrum Alliance