យោបល់លើសេចក្តីព្រាងប្រកាសស្តីពីបទដ្ឋានបច្ចេកទេសនៃគ្រឿងសម្ភារៈបរិក្ខារទូរគមនាគមន៍

Comments on the Draft Prakas on Technical Standards of Telecommunications Equipment

ស្ថាប័ន៖ Name of Entity:	Dynamic Spectrum Alliance, DSA
ឈ្មោះ៖ Name:	
តួនាទី៖ Position:	
លេខទូរសព្ទ និងអ៊ីម៉ែល៖ Mobile and Email:	
កាលបរិច្ឆេទនៃការផ្តល់យោបល់៖ Date of Submission:	May 25th 2026
ឯកសារយោង៖ Reference:	

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ប្រកាសស្តីពីបទដ្ឋានបច្ចេកទេសនៃគ្រឿងសម្ភារៈបរិក្ខារទូរគមនាគមន៍ Prakas on Technical Standards of Telecommunication Equipment		
ចំណងជើង Title		
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អត្ថបទដើម Original Text	**យោបល់ និងហេតុផល** Comments and Reasons	**សំណើកែលំអ** Proposal for Improvement
Chapter 1		
ប្រការ ១ Article 1		
ប្រការ ២ Article 2		
ប្រការ ៣ Article 3		
ជំពូកទី២ Chapter 2		
ប្រការ ៤ Article 4		
ប្រការ ៥ Article 5		
ជំពូកទី៣ Chapter 3		
ប្រការ ៦ Article 6		
ជំពូកទី៤ Chapter 4		
ប្រការ ៧		

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ប្រការ ៨ Article 8		
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3.2 Minimum Requirements for Telecommunication Test and Measurement Equipment		
3.3 Minimum Requirements for Telecommunication Terminal (User) Equipment		
3.4 Explanatory Notes		
Annex1: TRC-TS-WTE Conformance Testing / Verification Checklist		
Annex 2: Glossary		
បរិសិដ្ឋទី២៖ បទដ្ឋានបច្ចេកទេសនៃស្ថានីយអប់តែនទូរសព្ទចល័តនិងស្ថានីយបញ្ជូនបន្ត Appendix 2: Technical Standard of Cellular Base Station and Repeater System (TRC-TS-CBS)		
Title		
Abbreviations		

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Part 3. Minimum Requirements for CBS Equipment		
3.1 Minimum Requirements for CBS Equipment		
3.2 Explanatory Notes		
Annex 1: CBS Conformance Testing / Verification Checklist		
Annex 2: Glossary		
បរិសិដ្ឋទី៣៖ បទដ្ឋានបច្ចេកទេសនៃគ្រឿងសម្ភារៈបរិក្ខារទូរសព្ទចល័ត Appendix 3: Technical Standard of Cellular Mobile Terminal (TRC-TS-CMT)		
Title		
Abbreviations		
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Part 2. Reference Standards		
Part 3. Minimum Requirement for CMT Devices		
3.1 Minimum Requirements for CMT Devices		
3.2 Explanatory Note		
Annex 1: CMT Conformance Testing / Verification Checklist		
Annex 2: Glossary		
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Title		
Abbreviations		

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Part 2. Reference Standards		
Part 3. Minimum Requirements for LMR Equipment		
3.1 Minimum Requirement for LMR Equipment		
3.2 Explanatory Note		
Annex1: TRC-TS-LMR Conformance Testing / Verification Checklist		
Annex 2: Glossary		
បរិសិដ្ឋទី៥៖ បទដ្ឋានបច្ចេកទេសនៃគ្រឿងសម្ភារៈបរិក្ខារវិទ្យុគមនាគមន៍រយៈចម្ងាយខ្លី Appendix 5: Technical Standard of Short-Range Devices (TRC-TS-SRD)		
Title		
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Part 1. Introduction		
Part 2. Reference Standards		
Part 3. Minimum Requirements for SRD		
3.1 Minimum Requirement for SRD		
3.2 Explanatory Note	Table 1: Minimum Technical Requirements for Radio Equipment to be use in SRD Applications 1. **1. Sub-band 30a and 30b: 5.150–5.350 GHz (RLAN)** The current power limitation in the 5.150–5.350 GHz band constrains the ability of RLAN technologies to fully support growing connectivity requirements and emerging high-capacity applications in Cambodia. In practice, the spectrum currently available for higher-power outdoor RLAN deployment remains narrow and	The DSA encourages TRC to consider adopting the flexibility provided under ITU-R Resolution 229 (WRC-19) to enable higher-power RLAN operation in the 5.150–5.350 GHz band, including controlled outdoor use under appropriate technical conditions. Enabling up to 1 W EIRP, together with suitable mitigation measures such as elevation masks and coexistence requirements, would improve the usability of the band for broadband

អត្ថបទដើម Original Text	យោបល់ និងហេតុផល Comments and Reasons	សំណើកែលំអ Proposal for Improvement
	operationally constrained, particularly for wider channel configurations. Existing channel availability and DFS related operational requirements may reduce deployment flexibility and affect network performance in dense or high-throughput environments. Additional flexibility for outdoor RLAN operation would help improve network reliability, increase spectrum efficiency, and better support Cambodia's expanding digital infrastructure needs.	connectivity, enterprise deployments, and public access networks while continuing to protect incumbent satellite services.
	2. Sub-band 33a and 33b: 5.945 – 6.425 GHz (RLAN) The introduction of RLAN operation in the 5.945–6.425 GHz range is an important step toward supporting next-generation wireless connectivity in Cambodia. However, limiting access to only the lower portion of the 6 GHz band may reduce the ability of emerging Wi-Fi technologies to fully utilise wider channel bandwidths and deliver optimal performance in high-density and high-capacity environments. Access to broader contiguous spectrum is increasingly important for applications requiring higher throughput, lower latency, and improved reliability, including enterprise connectivity, immersive applications, and advanced digital services.	The DSA encourages TRC to change RLAN to 'WAS/RLAN' in Application Types to align with ITU and European standards. Furthermore, TRC should consider a progressive and forward-looking roadmap toward enabling WAS/RLAN access across a broader portion of the 6 GHz band, beginning from 5925 MHz and gradually extending access toward the full 6 GHz range (5.925-7.125 GHz) subject to appropriate coexistence studies and incumbent protection measures. As an intermediate step, TRC could consider extending WAS/RLAN access at least up to 6585 MHz, which would enable one additional contiguous 160 MHz channel beyond the lower 6 GHz band. This additional spectrum would provide meaningful improvements in capacity, throughput, and spectrum efficiency for next-generation Wi-Fi technologies, particularly in high-density and

អត្ថបទដើម Original Text	យោបល់ និងហេតុផល Comments and Reasons	សំណើកែលំអ Proposal for Improvement
		enterprise environments. Similar approaches are already being considered internationally, including in Australia, where regulatory discussions have examined broader and more flexible use of the 6 GHz band. WAS/RLAN access to the upper 6 GHz band would provide greater long-term regulatory flexibility while supporting the continued evolution of next-generation Wi-Fi technologies that increasingly rely on wider contiguous spectrum channels. Expanding spectrum availability over time would help improve network capacity, reduce congestion in high-density environments, support advanced digital applications, and enable more efficient spectrum utilisation across residential, enterprise, educational, and industrial use cases. It would also allow Cambodia to align more closely with evolving international developments and device ecosystems, while ensuring that future regulatory decisions remain adaptable to technological advancements, market demand, and practical coexistence experience.
Annex 1: TRC-TS-SRD Conformance Testing/ Verification Checklist		
Annex 2: Glossary		
បរិសិដ្ឋទី៦៖ បទដ្ឋានបច្ចេកទេសនៃគ្រឿងសម្ភារៈបរិក្ខារអ៊ីនធឺណិតនៃវត្ថុ Appendix 6: Technical Standard of Internet of Things (TRC-TS-IOT)		
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Part 1. Introduction		
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3.2 Explanatory Note		
Annex 1: TRC-TS-IOT Conformance Testing / Verification Checklist		
Annex 2: Glossary		
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Part 2. References Standards		
Part 3. Minimum Requirements for UWB Devices		
3.1 Minimum Requirement for UWB Devices		
3.2 Explanatory Note		
Annex 1: TRC-TS-UWB Conformance Testing / Verification Checklist		
Annex 2: Glossary		
បរិសិដ្ឋទី៨៖ បទដ្ឋានបច្ចេកទេសនៃគ្រឿងសម្ភារៈបរិក្ខារប្រព័ន្ធដឹកជញ្ជូនឆ្លាត Appendix 8: Technical Standard of Intelligent Transport Systems (TRC-TS-ITS)		
Title		
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Part 1. Introduction		
Part 2. References Standards		

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Part 3. Minimum Requirements for ITS Equipment		
3.1 Minimum Requirement for ITS Equipment		
3.2 Explanatory Note		
Annex 1: TRC-TS-ITS Conformance Testing / Verification Checklist		
Annex 2: Glossary		
បរិសិដ្ឋទី៩៖ បទដ្ឋានបច្ចេកទេសនៃគ្រឿងសម្ភារៈបរិក្ខារប្រព័ន្ធដឹកជញ្ជូនឆ្លាត Appendix 9: Technical Standard of Intelligent Transport Systems (TRC-TS-ITS)		
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Part 2. Reference Standards		
Part 3. Minimum Requirements for MAR Equipment		
3.1 Minimum Requirements for MAR Equipment		
3.2 Explanatory Notes		
Annex 1: TRC-TS-MAR Conformance Testing / Verification Checklist		
Annex 2: Glossary		
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Title		
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Part 1. Introduction		
Part 2. Reference Standards		

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Part 3. Minimum Requirements for AER Equipment		
3.1 Minimum Requirements of Aeronautical Radio Equipment		
3.2 Explanatory Notes		
Annex 1: TRC-TS-AER Conformance Testing / Verification Checklist		
Annex 2: Glossary		
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Part 2. Reference Standards		
Part 3. Minimum Requirements for AMR Equipment		
3.1 Minimum Requirement for AMR Equipment		
3.2 Explanatory Note		
Annex 1: TRC-TS-AMR Conformance Testing / Verification Checklist		
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បរិសិដ្ឋទី១២៖ បទដ្ឋានបច្ចេកទេសនៃទូរសព្ទចល័តសកលផ្កាយ់ខ្លួនដែលដំណើរការដោយសេវាកម្មផ្កាយរណបគមនាគមន៍ Appendix 12: Technical Standard of Global Mobile Personal Communication Satellite (GMPCS) Terminals (TRC-TS-GMPCS)		
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Part 1. Introduction		
Part 2. Reference Standards		

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3.1 Minimum Requirement for GMPCS Terminals		
3.2 Explanatory Note		
Annex 1: TRC-RTS- GMPCS Conformance Testing / Verification Checklist		
Annex 2: Glossary		
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Part 2. Reference Standard		
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3.2 Explanatory Note		
Annex 1: TRC-TS-DVB-T2-IRD Conformance Testing / Verification Checklist		
Annex 2: Glossary		