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

July 10, 2026

State Secretary for Economic Affairs and Climate Policy
Ministerie van Economische Zaken en Klimaat (EZK)
Bezuidenhoutseweg 73 2594 AC Den Haag Nederland

Re: Amendment of the National Frequency Plan 862-870 MHz and 6425-7125 MHz

Dear Sir/Madam

The Dynamic Spectrum Alliance (DSA)[1] welcomes the opportunity to comment on the proposed amendment to the Dutch National Frequency Plan as it relates to the 6425–7125 MHz band. This response is limited to the Upper 6 GHz band and does not address the separate proposal concerning the 862–870 MHz band.

The DSA is concerned that, although the proposal is formally presented as an interim measure, it already points in a clear policy direction by suspending new licensing in the 6425–7125 MHz band, ending the automatic rollover of existing licences, and extending current licences only to a fixed end date of 1 January 2030 through proposed footnote HOL014. In the explanatory memorandum, these measures are explicitly linked to preparing the band for possible future public mobile communications use, particularly in the 6585–7125 MHz segment.

The DSA supports a balanced and technologically neutral approach. While the future of the Upper 6 GHz band in Europe remains under consideration, it is vital that Dutch policy maintains a broad range of prospective outcomes, thereby preserving and strengthening the opportunities for meaningful WAS/RLAN access in this strategically important band. This is especially important because the explanatory memorandum itself recognizes that coexistence conditions with wireless LAN are significantly more favorable than coexistence with public mobile communications, and Dutch policy research has identified a hybrid approach as a serious option for the band's future use.

The DSA urges the Dutch authorities to ensure that any interim amendment for 6425–7125 MHz keeps a technology neutral approach. This will allow the final allocation of the band to be determined based on a comprehensive, future-focused review, ensuring a long-term path for substantial licence-exempt use within the final European and national framework.

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. Need for a neutral interim approach

The DSA supports an interim approach that maintains flexibility while broader European and international discussions continue. The explanatory memorandum acknowledges that the future of the 6425–6585 MHz segment remains linked to ongoing CEPT studies, European decision-making, and the outcomes of WRC-27. As these processes continue to evolve, maintaining flexibility will allow future decisions to be informed by technical evidence, international developments, and practical implementation experience.

This is particularly important because the upper 6 GHz band supports both IMT and WAS/RLAN ecosystems. The consultation recognizes its importance for both mobile communications and wireless LAN and notes that coexistence conditions with wireless LAN are significantly more favourable than those with public mobile communications. This observation highlights the importance of preserving flexibility while future regulatory and technical considerations continue to develop.

The DSA therefore encourages an interim framework that preserves future policy options while broader regional and international processes are completed. Such an approach would allow future decisions to consider a range of potential spectrum use scenarios, including substantial WAS/RLAN access where this would support efficient spectrum use, effective coexistence, and evolving connectivity requirements.

2. Importance of WAS/RLAN in Upper 6 GHz

The upper 6 GHz band represents one of the most significant remaining opportunities to provide sufficiently wide contiguous spectrum for next-generation Wi-Fi and other licence-exempt broadband applications. This matters because wide channels, high-capacity indoor connectivity, enterprise networks, public venues, and advanced consumer applications all benefit from access to larger blocks of spectrum.

The Dutch policy study[2] on the future use of the 6 GHz band considered a range of potential long-term spectrum use scenarios, including a hybrid approach under which at least 320 MHz could be made available for WLAN and at least 300 MHz for mobile communications. This illustrates that balanced spectrum arrangements remain a viable option as future policy decisions continue to evolve.

From the DSA's perspective, maintaining the opportunity for meaningful licence-exempt access remains important to supporting affordable connectivity, a robust device ecosystem, innovation in wireless networking, and efficient spectrum use across a wide range of environments. Maintaining flexibility while European studies and international developments continue will enable future decisions to take account of evolving technical evidence, market demand, and coexistence experience, while preserving the potential benefits that both mobile and licence-exempt technologies can deliver.

3. Maintaining Long-Term Policy Flexibility

The DSA recognizes the objective of the proposed amendment to avoid creating new long-term rights while broader European discussions on the future use of the upper 6 GHz band continue. This provides an appropriate basis for an interim framework during a period of ongoing technical and regulatory development. At the same time, the explanatory memorandum indicates that consideration is being given to mobile use of parts of the band, including the 6585–7125 MHz range, while also acknowledging that further European studies and policy decisions are still ongoing. From the DSA perspective, the administration should also consider that there may be no need to vacate all fixed links

[2] https://www.rijksoverheid.nl/documenten/2025/11/30/beleidsopties-upper-6-ghz-band

nationwide, particularly if IMT deployment in the band might be ultimately confined to localized use cases or Fixed Wireless Access (FWA) applications. The interim framework would benefit from clearly reaffirming that future decisions will continue to consider the full range of potential spectrum use scenarios, including substantial WAS/RLAN access and sharing approaches where appropriate.

Maintaining a balanced and technology-neutral approach throughout this process will help ensure that future decisions can take account of evolving evidence, practical deployment experience, and the potential benefits of both mobile and licence-exempt technologies.

4. Recommended revisions

The DSA respectfully recommends that the Dutch authorities continue to frame the proposed amendment as an interim measure that maintains flexibility while European and international discussions on the future use of the upper 6 GHz band continue. In particular, the DSA recommends that:

- The explanatory memorandum continue to reflect that the long-term use of the 6585–7125 MHz band remains subject to ongoing European studies and future policy decisions.
- The final policy framework preserve the opportunity to consider substantial WAS/RLAN access as one of the potential long-term arrangements for the upper 6 GHz band.
- Future policy assessments continue to take account of the consultation's observation that coexistence with wireless LAN is generally more favourable than coexistence with public mobile communications, alongside other relevant technical and policy considerations.
- National decision-making continue to evaluate a range of implementation options, including hybrid approaches that accommodate both mobile and licence-exempt use in a manner consistent with evolving European frameworks and national connectivity objectives.
- Interim regulatory measures continue to support a technology-neutral approach that preserves flexibility while further technical studies, market developments, and European decisions progress.

Such an approach would provide the Netherlands with the flexibility to make future decisions based on evolving technical evidence, international harmonization, and national policy objectives, while maintaining the opportunity to consider both mobile and licence-exempt use of the upper 6 GHz band.

5. Conclusion

The DSA appreciates the Netherlands' efforts to establish an interim regulatory framework for the upper 6 GHz band while broader European and international discussions continue to evolve. The proposed approach provides an important opportunity to maintain regulatory certainty during this period while allowing future decisions to be informed by ongoing technical studies, market developments, and European policy outcomes.

As the long-term framework continues to develop, the DSA encourages the Dutch authorities to maintain a technology-neutral and flexible approach that preserves the opportunity to consider a range of future spectrum use scenarios, including substantial WAS/RLAN access and hybrid approaches where appropriate. Such an approach would support evidence-based decision-making, reflect the consultation's recognition of the favourable coexistence characteristics of wireless LAN, and remain consistent with the Dutch policy study's consideration of balanced spectrum arrangements for the upper 6 GHz band.

The DSA looks forward to continuing to engage with the Dutch authorities and other European stakeholders as the future framework for the upper 6 GHz band evolves.