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

August 24, 2026

RSPG Secretariat
Office L-51 05/DCS
Commission Européenne
1049 Bruxelles, BELGIQUE

Re: Draft DSA Response to "WRC-27 Agenda Items and RSPG Recommendations"

Dear Sir/Madam,

The Dynamic Spectrum Alliance (DSA)[1] welcomes the opportunity to comment on the draft RSPG Opinion on WRC-27 Agenda Item 1.7. The DSA recognises the RSPG's efforts to protect incumbent services while preserving regulatory flexibility to support future wireless connectivity.

Our comments will focus on Agenda Item 1.7, because of the relationship between the potential identification of the 7 125 – 7 250 MHz band for International Mobile Telecommunications and the use of the 6 425 – 6 585 MHz band for WAS/RLANs in Europe. In effect, the RSPG Opinion on the long-term vision for the Upper 6 GHz band, published in November 2025, provides that the future use of the 6 425 – 6 585 MHz range in Europe will be determined by the outcome of WRC-27 Agenda Item 1.7 for the lower part of the 7 GHz band under study in Region 1[2].

Agenda Item 1.7 addresses possible identification for International Mobile Telecommunications (IMT) in the frequency bands 4 400 – 4 800 MHz, 7 125 – 8 400 MHz, and 14.8 – 15.35 GHz, depending on ITU Region. For Region 1, the draft RSPG recommendation is to oppose IMT identification in 4 400 – 4 800 MHz, 7 250 – 8 400 MHz, and 14.8 – 15.35 GHz, while supporting possible IMT identification in 7 125 – 7 250 MHz subject to successful studies and protection of incumbent services.

Given this complex regulatory context, and due to the importance of the 6 425 – 6 585 MHz band for WAS/RLAN deployment in Europe, the DSA supports the identification of 7 125 – 7 250 MHz for IMT in Europe:

(1) provided that ongoing ITU-R sharing and compatibility studies demonstrate that incumbent in-band and adjacent-band services can continue to operate without additional regulatory or technical constraints and
(2) given that it is under the same conditions of footnote 5.457E.

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[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.

[2] Region 2 and Region 3 are studying the frequency band 7 125 – 8 400 MHz (or parts thereof), while Region 1 is studying the frequency bands 7 125 – 7 250 MHz and 7 750 – 8 400 MHz (or part thereof);

This footnote specifies that IMT identification does not preclude the use of these frequency bands by any application of the services to which they are allocated and does not establish priority in the Radio Regulations and that the frequency bands are also used for the implementation of wireless access systems (WAS), including radio local area networks (RLANs).

The DSA considers this to be a constructive and balanced outcome, enabling administrations that choose to identify the band for IMT to continue supporting licence-exempt WAS/RLAN deployments in accordance with their national spectrum policies. This approach is also consistent with the broader structure of the RSPG draft, which links Agenda Item 1.7 to connectivity policy.

The identification of 7 125 – 7 250 MHz for IMT has the potential to support a balanced long-term framework for the upper 6 GHz and lower 7 GHz bands in Europe. Such an approach would provide administrations with the flexibility to develop complementary spectrum access frameworks that address the connectivity needs of both licenced mobile broadband (IMT) and licence-exempt wireless access systems, including WAS/RLAN. By promoting coexistence and regulatory flexibility, European administrations can benefit from complementary, rather than competing, spectrum access models that maximise innovation, investment, competition and consumer welfare.

The RSPG draft notes the need to protect different users in the 7 GHz and 8 GHz band, including existing Ultra-Wideband applications. The DSA agrees on the importance of protecting existing users of the band, including Ultra-Wideband applications. In particular, the DSA emphasises the need to preserve the vibrant and highly successful licence-exempt ecosystem already operating in these frequencies. Accordingly, the DSA opposes IMT identification in 7 400 – 8 400 MHz.

The DSA believes that a balanced European framework for the upper 6 GHz and 7 GHz bands, supporting both licenced and licence-exempt connectivity, can best be achieved through technology-neutral regulation, evidence-based coexistence studies, modern spectrum-sharing approaches, and continued international harmonisation.

The DSA appreciates the opportunity to contribute to this consultation and encourages the adoption of a balanced, evidence-based position on Agenda Item 1.7 that promotes efficient spectrum use while safeguarding existing services and future innovation.

Sincerely,

Dr. Martha SUAREZ
President
Dynamic Spectrum Alliance, DSA