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

August 25, 2026

Agencija za komunikacijska omrežja in storitve Republike Slovenije (AKOS)
Stegne 7, 1000 Ljubljana
info.box@akos-rs.si

Re: DSA response to "Zasnova strategije upravljanja z radiofrekvenčnim spektrom za obdobje 2027-2029" (0070-1/2026)

Dear Sir/Madam,

The Dynamic Spectrum Alliance[1] (DSA) welcomes the opportunity to provide comments on AKOS's proposed Radio Spectrum Management Strategy for 2027–2029, and specifically on the proposed approach to the upper 6 GHz band in Section 2.1.1.3 and Action 3.

The DSA recognises Slovenia's sovereign right to determine the use of spectrum within its territory, consistent with applicable EU and international obligations. The DSA also recognises AKOS's objective of ensuring sufficient spectrum for future connectivity, competition and innovation. However, the DSA recommends that the Strategy does not prejudge the future European outcome for the upper 6 GHz band.

In particular, the DSA does not support the proposed assumption that, if WRC-27 does not identify 7125–7250 MHz for IMT, this should create a strong case for assigning 6425–6585 MHz to MFCN. These are separate policy decisions. The WRC-27 outcome for 7125–7250 MHz should not predetermine the future use of 6425–6585 MHz, which is subject to ongoing European consideration of the requirements of WAS/RLAN, MFCN and other relevant uses.

The DSA therefore recommends that Slovenia preserve flexibility pending completion of the relevant EU and CEPT work, rather than establishing a national presumption in favour of a particular technology. This will allow Slovenia to take account of the final European framework, market demand, technical evidence and coexistence opportunities before making long-term national decisions.

By way of example, we refer AKOS to the proposed approach by Ofcom in the UK regarding expanded access for Wi-Fi services, and Ofcom's recent announcement to extend the frequency range allocated to Wi-Fi by an additional 160 MHz (from 5925–6425 MHz to include 6425–6585 MHz), under the same technical conditions as the Lower 6 GHz band[2]. Ofcom has concluded that decisions can be sequenced:

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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] " Expanding access to the 6GHz band for commercial mobile and Wi-Fi services" Ofcom Statement 20 July 2026 available at https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-3-4-weeks/consultation-expanding-access-to-the-6-ghz-band-for-commercial-mobile-and-wi-fi-services/main-document/statement-expanding-access-to-the-6-ghz-band-for-commercial-mobile-and-wi-fi-services.pdf?v=422807

expanding Wi-Fi access now to meet immediate demand while preserving the option to assess mobile use and sharing models later in the decade. Furthermore, Ofcom also published regulations for AFC systems and AFC-managed devices, which will apply across the 6 GHz band. Other European countries, including Germany, are also exploring the potential to use AFC systems, which are also known as a DSACF (dynamic spectrum access coordination function), to enable non-priority WAS/RLAN use in the upper 6 GHz band to make better use of the band while protecting incumbents. This is consistent with statutory duties around spectrum efficiency, avoids locking up the band prematurely and reduces the "binary choice" framework often presented by other stakeholders.

The DSA encourages AKOS to avoid framing upper 6 GHz as a binary choice between MFCN and WAS/RLAN. The Strategy itself recognises spectrum sharing as an important European policy objective. In this context, the draft CEPT Report 94 identifies a prioritised band-split approach, supported by a database-assisted framework, as the most viable approach under consideration for enabling non-prioritised WAS/RLAN use in the portion of the band prioritised for IMT.

This work forms part of a broader European Commission mandate to CEPT. Under the mandate, CEPT Report 92 addresses coexistence between IMT/WAS/RLAN and incumbent services, while subsequent CEPT work addresses shared use between MFCN and WAS/RLAN and the development of longer-term harmonised technical conditions.

The DSA is of the view that ongoing European technical and regulatory work should therefore be allowed to determine whether complementary or shared approaches can deliver greater overall value and more efficient spectrum use than exclusive assignment.

Slovenia may ultimately choose a national implementation reflecting its own connectivity requirements and circumstances. That national choice should not, however, be used to predetermine, constrain or establish precedent for the outcome in CEPT or elsewhere in Europe. Equally, decisions by individual administrations should not limit the ability of other European countries to adopt different approaches consistent with the future European regulatory framework.

The DSA therefore recommends that Section 2.1.1.3 and Action 3 remain technology-neutral as to the future use of 6425–6585 MHz until the relevant European processes are complete, and that the Strategy explicitly preserve consideration of WAS/RLAN and spectrum-sharing approaches in the upper 6 GHz band.

In summary, Slovenia should retain the freedom to make its own national spectrum choices, while preserving the freedom of CEPT and other European administrations to reach different conclusions. A national decision by Slovenia should not become a precedent for Europe.

Sincerely,

Dr. Martha SUAREZ
President
Dynamic Spectrum Alliance, DSA