Respondent contact details	
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Dynamic Spectrum Alliance Limited
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September 20, 2026

Executive Director, Spectrum Management Affairs
Telecommunications and Digital Government Regulatory Authority
P.O. Box 26662, Abu Dhabi, UAE

Re: DSA Response to TDRA's Public Consultation on the Regulations for Fixed Radio Systems

Dear Sir/Madam,

The Dynamic Spectrum Alliance (DSA)[1] welcomes the opportunity to provide comments on the Telecommunications and Digital Government Regulatory Authority (TDRA) Public Consultation on the proposed revision of the TDRA Regulations – Fixed Radio Systems.

The DSA supports TDRA's objective of updating the Regulations to reflect developments in radio technology, relevant ITU-R Recommendations, and the evolving use of Fixed Radio Systems in the UAE. The DSA also supports TDRA's stated principles of transparency, fairness and openness in considering stakeholder views as part of the regulatory review.

DSA's comments below focus on the proposed definition of Fixed Wireless Access, the treatment of specific frequency bands and usage conditions, and the technical provisions applicable to Fixed Radio Systems.

The DSA and its members welcome continued engagement with the TDRA. We would be pleased to discuss these comments and provide any additional information.

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.

Question 1: Do you have any proposed modifications/additions/suppressions to Scope of Regulations?

No comments.

Question 2: Do you have any proposed modifications/additions/suppressions to Definitions?

The DSA supports a technology-neutral definition of Fixed Wireless Access (FWA). ITU R Recommendation F.1399 defines FWA as "a wireless access application in which the location of the end-user termination and the network access point to be connected to the end-user are fixed." ITU R Recommendation F.592 4 similarly identifies FWA as a fixed-service application and defines it as a "fixed wireless system application where both the end-user termination and the network access point are fixed."

The DSA therefore recommends that the definition be revised as follows:

"Fixed Wireless Access" or "FWA" means a wireless access application in which the location of the end-user termination and the network access point to be connected to the end-user are fixed.

This definition is clear, technology-neutral and consistent with ITU R terminology. It does not limit FWA to a particular radio technology, frequency band, network architecture, service provider model or spectrum-authorisation approach. Any applicable technical, coordination or authorisation conditions should instead be specified separately in the relevant frequency band, technical regulation or frequency-spectrum authorisation.

Question 3: Do you have any comments on the uses indicated above?

No comments.

Question 4: Do you agree with the above frequency bands and usage restrictions? Do you have any proposed modifications/additions/suppressions to these frequency bands or usage restrictions?

The DSA does not support the deletion of "Wideband Data Transmission (e.g. WLAN)" from the 2400-2483.5 MHz band.

Article 4.2 states that the table is not exhaustive with respect to Fixed Radio Systems and that the National Frequency Allocation Table remains the reference for fixed-service allocations and assignments. However, the 2400–2483.5 MHz band is widely used by WAS/RLAN and other licence-exempt devices, which require regulatory certainty to continue operating.

The DSA therefore recommends retaining the existing description of the band, including wideband data transmission applications (e.g. WLAN). Alternatively, if the proposed deletion is intended only as an editorial change reflecting the scope of the Fixed Radio Systems Regulations, the DSA recommends that TDRA expressly confirm that the deletion does not affect the continued authorisation and operation of WAS/RLAN in the 2400–2483.5 MHz band.

Question 5: Do you agree on adding below frequencies?

- **Development of new Recommendation ITU-R F.[W-BAND] - Radio-frequency channel and block arrangements for Fixed Service systems operating in the 92-94 GHz, 94.1 100 GHz, 102-109.5 GHz and 111.8 114.25 GHz ranges; New frequency ranges for high capacity links.**
- **Development of a new Recommendation ITU-R F.[D-BAND] - Radio-frequency channel**

and block arrangements for Fixed Service systems operating in the 130 134 GHz, 141-148.5 GHz, 151.5-164 GHz and 167-174.8 GHz ranges; New frequency ranges for high capacity links.

No comments.

Question 6: Do you have any further comments concerning the above provisions and technical conditions on Fixed Radio Systems?

The DSA supports TDRA's objective of updating the Fixed Radio Systems Regulations. The DSA recommends, however, that the technical framework remain sufficiently flexible and technology-neutral to accommodate evolving wireless technologies, network architectures, and spectrum access models, particularly within the 6425-7125 MHz band.

WRC-23 identified the 6425-7125 MHz frequency band in Region 1 for use by administrations wishing to implement the terrestrial component of International Mobile Telecommunications (IMT). However, this identification does not preclude the use of these frequencies by any application of the services to which they are allocated, nor does it establish any priority in the Radio Regulations.

The DSA therefore encourages TDRA to ensure that implementation of the Fixed Radio Systems Regulations preserves the ability to consider appropriate sharing and coexistence mechanisms between fixed-service, IMT, WAS/RLAN and other permitted applications as the regulatory and technical framework for the 5925–7125 MHz range continues to evolve.

Question 7: Do you have any comments on coordination/notification indicated above?

No comments.