

**The Chairman**  
**Malaysian Communications and Multimedia Commission**  
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**(Attention: Spectrum Planning and Assignment Division)**  
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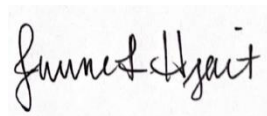
Dear Chairman,

We, the undersigned companies, would like to express our gratitude to MCMC for providing the industry an opportunity to comment on "Proposed Malaysia's Positions for WRC-23 Agenda Items". Through this input, we aim to present our views for your administration's consideration in preparing your positions for WRC-23 Agenda Item 1.2 - 6 425 – 7 025 MHz for Region 1 (Band 4), 7 025 – 7 125 MHz for Global (Band 5), as well as Agenda Item 10 - Future Agenda Items.

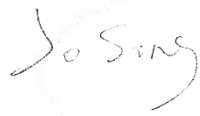
We have outlined our views and justifications on the proposed Malaysia's positions in the table provided in the Annex.

Thank you.

Yours sincerely



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**Amazon, Apple, Broadcom, Cisco, Dynamic Spectrum Alliance, HPE, Intel, Meta  
Annex View on WRC-23 Agenda Items.**

Agenda Item	Comments and Views on Proposed Malaysia’s Positions
Fixed, Mobile and Broadcasting Issues	
1.2	<p><b>For frequency bands 6425-7025 MHz (Region1) and 7025-7125 MHz (globally), we recommend Malaysia to support method 4A and 5A in the report of CPM23-2: proposing no change to the Radio Regulations, except for suppression of Resolution 245 (WRC 19).</b></p> <p>We believe that adopting “No Change” method for this Agenda Item will provide the maximum benefit for Malaysia’s national interest and market opportunities.</p> <p>The 6425 – 7125 MHz band is allocated to the Mobile Service on a primary basis. Adopting a “No Change” method in this frequency band promotes technology neutrality, providing Malaysia the regulatory flexibility to determine the best use of the spectrum based on their national priorities.</p> <p>An IMT identification will limit administrations’ flexibility and potentially restrict the outcome through the ITU process. While an IMT identification itself does not prioritize IMT in the Radio Regulations or exclude other applications or services, it does pre-determine the future use of the band for licensed IMT, as observed in other bands identified for IMT over the past two decades.</p> <p>It is worth noting that many countries across the three ITU regions have already made 5925 – 7125 MHz for license-exempt WAS/RLAN to use under the Mobile Service type. Regulatory harmonization for license-exempt use of the 6 GHz band creates economies of scale and fosters a robust equipment ecosystem, benefitting consumers and national economies worldwide.</p> <p>As mentioned in MCMC’s2021 consultation on WLAN in the 6GHz band, 6425 – 7125MHz is used by important incumbent services like Fixed Satellite Service (FSS) and Fixed Services (FS) with primary allocation in Malaysia, it is essential to ensure that compatibility and coexistence can be achieved in the frequency band between potential future technologies and current uses. The study outcome at ITU-R Working Party 5D indicates the difficulty for IMT to protect the incumbent FSS and FS. Mitigation methods would require an unrealistically low density and strict EIRP elevation masks for IMT deployment, resulting in very low efficiency of using the 6GHz spectrum. In contrast, Wi-Fi technology is designed to co-exist these primary services. By having a relatively low e.i.r.p. for Lower Power Indoor(LPI)/Very Low Power (VLP) devices, and leveraging Automated Frequency Coordination (AFC) technology for Standard Power (SP) devices, Wi-Fi can protect the incumbents in the 6 GHz band without limiting their future expansion. This has been evident in the US, where the Federal Communications Commission (FCC) delicensed the entire 6 GHz band in 2020, there has not been a single substantiated interference report made by incumbent service providers of legally operating license-exempt devices. In fact, the number of FS licenses in</p>

	the 6 GHz band has even increased by 8% since the band was authorized for license-exempt services.
General and Regulatory Issues	
10	<p><b>The companies advise Malaysia to oppose any proposal of studying on a new agenda item to consider identification of frequency bands 6425-7025 MHz in Region 3 for the terrestrial component of IMT.</b></p> <p>It is worth noting that the matter of IMT identification in the 6GHz frequency range was initially discussed during the study cycle of WRC-19. However, due to the complexity of incumbent situations and national interests, the proposal was thoroughly examined at <a href="#">APG19-5</a>, and APT Members agreed to only consider IMT identification in the 7025-7125MHz range for Region 3.</p> <p>The ITU-R study for this frequency range in Region 1 has already shown that IMT has significant difficulty to co-existence with incumbent services. Therefore, it is unnecessary to duplicate the effort in APT and ITU-R, especially considering the substantial time and efforts APT members have already invested in concluding that implementing IMT in the 6425-7025MHz range is not feasible.</p>