

Date: 14<sup>th</sup> March 2023

**SUBJECT : IMDA “Public Consultation issued by the Info-Communications Media Development Authority on Proposed Allocation of 6 GHz Band in Singapore”**

Encompass Digital Media (Asia) Pte. Ltd (“Encompass”) would like to thank IMDA for the opportunity to comment on the above subject matter. Please see our comments below.

**PART I**

Encompass understands the need for additional WiFi capacity and supports IMDA in ensuring that Singapore is aligned globally and able to benefit from new technologies.

**PART II**

Encompass fully appreciates the need to expand WiFi capacity and the global consensus evolving around the use of the 6GHz band for WiFi 6E

In Singapore, the lower 500MHz proposed for WiFi 6E (5,925 MHz – 6,425 MHz) is where all the TV satellite transmission is currently concentrated. It should be noted that the use of this band for satellite TV is expected to remain for some years and covers a very wide geographic area.

Satellite TV frequencies cannot be changed as they are set by the satellites being accessed.

**PART III**

Given the global standardization of WiFi 6E products, Encompass’ view is that protection of incumbent services is preferred in the lower 6GHz band rather than to suggest alternative frequencies.

#### PART 4 & Annex A : Summary of comments

- 1 At the powers suggested in Annex A, direct interference from a single device is unlikely due to the large difference in power levels between satellite TV transmissions and WiFi 6E
- 2 There is a possible risk of interference from multiple outdoor units concentrated close to a satellite station at the power levels suggested. Given the WiFi devices will not require a licence, a lower power limit outdoors would be preferable
- 3 Encompass notes and supports the IMDA comment in Annex 2 (2) that there is a need to “protect incumbent services”
- 4 Encompass plans to continue using the C-Band Fixed Satellite Services (FSS) frequencies for many years and continue to apply for new ES licences. It would be very disruptive to the broadcast industry should the 6E requirements place any additional restrictions on issuance of these licences.
- 5 Annex 2 (4) : *“For the use of standard power devices to facilitate fixed outdoor deployment at higher power, as such use is still nascent and yet to be widely adopted globally, IMDA will continue to monitor the development and review the demand and feasibility to allow such use in Singapore in the future”*. Encompass would request that IMDA continue to consult on any future plans, especially on use of higher powers, to ensure proper coordination of incumbent services.

Encompass would be happy to take part in any further discussion or provide any assistance possible to IMDA.

Kind regards,

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