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Ms. Aileen Chia
Director-General (Telecoms & Post)
Deputy CE (Connectivity Development & Regulation)
Infocomm Media Development Authority
10 Pasir Panjang Road
#03-01 Mapletree Business City
Singapore 117438

Re: US-ASEAN Business Council Feedback on Consultation on Proposed Allocation of 6 GHz Band

Dear Director-General Chia,

On behalf of the US-ASEAN Business Council (**US-ABC**) and our members, I would like to thank you for providing us this opportunity to comment on the proposed allocation of the 6 GHz band in Singapore.

We welcome IMDA's decision to release the lower 6 GHz band (i.e., 5925-6425 MHz) in Singapore for RLAN / Wi-Fi use on a licence-exempt basis. The Wi-Fi services and product market have rapidly evolved over the years. IMDA's decision to release the 6 GHz band will allow us to take greater advantage of existing technology innovation (e.g., Wi-Fi 6E equipment now available the global market) for local deployment. This is a step in the right direction to enable better quality of digital connectivity and coverage in Singapore, empowering the commercialization of emerging technologies and creating new promising use-cases.

However, we are concerned with the pace of consultations for allocation of the upper half of the 6 GHz band (i.e., 6425-7125 MHz). The Wi-Fi 6E technology and equipment eco-system is already mature as it stands today. Yet, we are unable to fully leverage the technology for business development and social good in Singapore, unless the whole 6 GHz band is allocated to RLAN / Wi-Fi use. Hence, we would like IMDA to strongly consider releasing the full 6 GHz band (i.e., 5925-7125 MHz) for RLAN / Wi-Fi license-exempt use. Please see our elaboration in the following points below.

1. Constraints posed to realizing the full potential of Wi-Fi 6 GHz network performance

The net improvement in Wi-Fi network performance (and therefore the quality of Wi-Fi services experienced by end users) between pre-allocation of 6 GHz band and post-allocation of only the lower half of the 6 GHz band (i.e., 5925-6425 MHz) is limited. The amount of spectrum in the lower 6 GHz band is not sufficient to provide a minimum of 7 wideband channels (i.e., at least 80 MHz channels) necessary for a dense Wi-Fi deployment in environments such as stadiums, hospitals and schools. As a result, networks deployed with Wi-Fi 6E will still need to fall back on 40 MHz channels typically used in today's Wi-Fi networks operating the 5 GHz band. Therefore, there will be limited improvement in network performance, including those deployed under the Government's widely available Wireless@SG initiative across public areas, community centers, healthcare centers, transportation centers, education centers and other government agencies around the country, unless the full 6 GHz spectrum is made available for Wi-Fi use.

2. Challenges and frictions created in business' network planning and deployment cycles

Businesses can only deploy new innovative services and products inasmuch as there is approved / allocated spectrum available to deploy such services and products. We urge IMDA not to delay the allocation of the upper half of the 6 GHz band any longer, having considered it for more than two years. Otherwise, companies in Singapore investing in planning network

deployment cycles involving Wi-Fi equipment, including those involved in the Wireless@SG deployments and pending upgrades, will be left in a dilemma of whether to suspend deployment of equipment for only half the band that may become obsolete once there is decision on the full 6 GHz spectrum allocation. During this period of uncertainty regarding the availability of the upper 6 GHz band, our members are concerned that the products manufactured during this time may end up being phased out earlier than our usual product and network planning timelines – therefore incurring significant sunk costs – just to accommodate the finalized 6 GHz spectrum allocation decisions.

3. No necessity to wait for WRC-23's 6 GHz decision before finalizing Singapore's 6 GHz spectrum allocation

We would like IMDA to consider not waiting for the WRC-23 decision on Agenda Item 1.2 in Q4 2023 – to inform Singapore's 6 GHz spectrum allocation decisions. Countries wishing to use the band for 5G do not require IMT identification at WRC-23.

Director-General Chia, thank you again for your efforts and receptivity towards the feedback of the U.S. business community. I hope that you will continue to view us as a trusted resource and partner. Some of our members are also submitting their own response to this IMDA consultation. I strongly encourage you to also take their feedback into consideration for Singapore's 6 GHz spectrum allocation planning. Should you have further queries, please feel free to contact me directly. Your staff may follow up with our Senior Director for Digital Policy, Mr. Mario Masaya at mmasaya@usasean.org or +1 [REDACTED] and Manager for ICT / Singapore Ms. Jileen Yong at jyong@usasean.org or +65-[REDACTED].

With best wishes,



Amb. Michael W. Michalak (ret.)
Senior Vice President and Regional Managing Director

cc: His Excellency Ashok Kumar Mirpuri, Singapore's Ambassador to the United States of America
His Excellency Jonathan E. Kaplan, Ambassador of the United States to Singapore