**To: The Australian Communications and Media Authority**

Dear Sir or Madam,

In the very beginning, we are very grateful for ACMA to release the discussion and options paper on "Exploring RLAN use in the 5 GHz and 6 GHz bands", this paper may provide very important guidance on our company's strategy in Australia in the next five years. Regarding the questions raised in this paper, responses from our company are summarized in the following table:

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| Q1 | What is the demand for spectrum for RLAN use in the 6 GHz band (5925–7125 MHz)? |
| | RLAN especially Wi-Fi products and services are widely used in the whole world and are still growing rapidly. Future Wi-Fi applications need to provide services with higher capacity and higher data-rate. To achieve this, new technologies (e.g., Wi-Fi 6) which could support larger bandwidth need to be introduced. In addition, the current 2.4/5.8GHz frequency bands are already very congested. Therefore, there is a momentum to open new spectrum for RLAN use in many countries and regions, 6GHz band is one of the options. With this, OPPO supports the preliminary view of ACMA to made lower part of 6GHz band (5925-6425MHz) available for use in Australia under the LIPD class licence. But for the higher part of 6GHz band, to balance the future requirements both from Wi-Fi and IMT systems, it's better to defer the frequency planning for this band until WRC-23 conference makes the final decision. |
| Q2 | Should the ACMA proceed, as proposed, to consult on a formal variation to the LIPD class licence that adds the frequency range 5925–6425 MHz for RLAN use, bounded by the parameters described in the ACMA's preliminary view section of this paper? |
| | OPPO supports ACMA to take the step as proposed for the lower 6GHz band. |
| Q3 | If class licensing arrangements are to be made in the lower 6 GHz band (by variation to the LIPD class licence), should alternative/additional power limits and/or other conditions be considered? |
| | OPPO supports the preliminary view made by ACMA to adopt similar arrangements recently implemented in the UK and other European countries, no alternative/additional power limits and/or other conditions need to be considered for the lower 6GHz band. |
| Q4 | Is it appropriate to consider inclusion of the upper 6 GHz band (6425–7125 MHz) in the LIPD class licence or should this be deferred to monitor future developments (for example, in the wide-area International Mobile Telecommunications (IMT) space) as outlined in the ACMA's preliminary view? We invite comments from submitters on the utility of the band for IMT use. |
| | OPPO suggests not to include the upper 6 GHz band (6425–7125 MHz) in the LIPD class licence at this stage. Because the Mid-bands including 6GHz are very important to future IMT systems. WRC-23 AI 1.2 is considering the identification of |

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| | this frequency band for IMT. To balance the future requirements both for IMT and Wi-Fi systems, OPPO suggests to defer the frequency planning for this band until WRC-23 conference makes the final decision. |
| Q5 | Should standard power (that is, higher power devices, including for outdoor use) operating under a dynamic spectrum access system such as the automatic frequency coordination (AFC) system adopted in the USA, be adopted in Australia for some or all of the 6 GHz band? Is there an appetite and capability for industry to provide the necessary systems to enable such use? We welcome views and evidence on the commercial and technical feasibility of introducing AFC systems in the band. |
| | No comments for the time being. |
| Q6 | Should the higher power regulatory arrangements and associated interference mitigation measures added to the International Telecommunication Union (ITU) Radio Regulations at WRC-19 (see Resolution 229 (Rev WRC-19)) in the 5 GHz band be included in any amendment to the LIPD class licence? |
| | No comments for the time being. |

The above is our company's preliminary views/comments for this discussion and options paper, we hope ACMA could give due consideration when making decisions.

Sincerely