

Re: Discussion paper “Automatic Frequency Coordination-assisted spectrum sharing in the 6 GHz band ”

Dear Respected Officer,

IEEE 802 LAN/MAN Standards Committee (LMSC) thanks Australian Communications and Media Authority (ACMA) for providing an opportunity to comment on the consultation “Views on 6 GHz band spectrum sharing and Automatic Frequency Coordination (AFC)”.

IEEE 802 LMSC is a leading consensus-based open standards development committee for networking standards that are used by industry globally. It produces standards for networking devices, including wired and wireless local area networks (“LANs” and “WLANs”), wireless specialty networks (“WSNs”), wireless metropolitan area networks (“Wireless MANs”), and wireless regional area networks (“WRANs”). Technologies produced by implementers of our standards are a critical element for all networked applications today.

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IEEE 802 LMSC applauds ACMA for initiating this crucial consultation on the AFC assisted standard-power use of the 6 GHz band, recognizing its immense potential for expanding unlicensed spectrum access and fostering innovation through technologies such as Wi-Fi 6E and Wi-Fi 7. The exploration of spectrum sharing mechanisms, particularly Automatic Frequency Coordination (AFC), is vital for maximizing the utility of this band while protecting incumbent services, as outlined in ACMA’s comprehensive discussion paper.

IEEE 802 LMSC strongly supports adopting a robust and efficient AFC framework for the 6 GHz band to enable widespread unlicensed device deployment through automated spectrum sharing that unlocks major economic and social benefits for Australia. We respectfully urge ACMA to embrace adoption of internationally recognized technical standards for AFC systems to promote:

- Interoperability among the AFC system providers and device manufacturers
- Reduced market fragmentation
- Technical robustness

¹ This document solely represents the views of IEEE 802 LMSC and does not necessarily represent a position of either the IEEE or the IEEE Standards Association or the IEEE Technical Activities.

Leveraging existing AFC System Under Test and Device Under Test standards and test methods developed by Wireless Innovation Forum² and Wi-Fi Alliance³ as a strong foundation for:

- Protecting incumbents effectively while maximizing unlicensed spectrum utilization
- Operational simplicity and scalability for users and manufacturers across diverse environments
- Collaborative government-industry roles where ACMA sets the regulatory framework and industry delivers innovative solutions consistent with the discussion paper's preliminary views
- Harmonization with the existing global AFC regulations from the FCC and ISSED, while tailoring them to Australia's unique incumbent landscape and regulations.

Our responses on ACMA's questions regarding AFC Use by Unlicensed Users

Q1. "Do you support the adoption of an AFC framework in Australia to enable outdoor standard-power operation in the 6 GHz band? What are the key benefits and concerns? In particular, who would the main beneficiaries be, and what would be the implications for consumers in the telecommunications market?"

IEEE 802 LMSC strongly supports adopting an AFC framework in Australia to enable outdoor standard-power operation in the 6 GHz band (i.e., 5925 MHz to 6585 MHz). Without AFC, operation in the 6 GHz band would remain limited to very low power (VLP) or low-power indoor (LPI) levels under the current Low Interference Potential Devices (LIPD) class licence, severely restricting the potential of this spectrum for Wi-Fi 6E and Wi-Fi 7 technologies. A well-designed AFC system serves as a critical enabler by providing automated, database-driven coordination that protects incumbent services, while extending additional spectrum for outdoor deployments. The protection mechanisms would also allow the ACMA to permit removable external antennas which would not only be useful in the outdoor space, but would also have benefits for indoor Wi-Fi networks, for example, serving areas with high ceilings and large open areas. Adopting an AFC framework would be of great value for a range of environments from university campuses and industrial sites to open public spaces and rural areas. With higher-power links supporting greater range and coverage, AFC assisted SP operation will enable innovative use cases like fixed wireless access, smart-city IoT, and enhanced public Wi-Fi which align with ACMA's goals for spectrum efficiency and flexibility.

Key beneficiaries include Wireless Internet Service Providers (WISPs) delivering cost-effective broadband to underserved regions, enterprises needing dense outdoor coverage, device manufacturers adapting global AFC gear for Australia, and consumers gaining faster, more reliable internet with greater competition. Note that challenges such as added complexity and costs for geolocation/secure AFC integration, dependence on platform reliability, and risks of overly conservative rules limiting spectrum access must be carefully managed to realise these deployment gains without compromising incumbent protection.

² Wireless Innovation Forum Extension to AFC System (SUT) and AFC Device (DUT) Compliance Test Plans, https://winnf.memberclicks.net/assets/work_products/Specifications/WINNF-TS-4007.pdf [Last accessed: 16 January 2026]

³ Wi-Fi Alliance System-to-Device Interface Specification, <https://www.wi-fi.org/discover-wi-fi/6-ghz-afc-resources> [Last accessed: 16 January 2026]

Q2. “How might AFC change the way WISPs and other communications service providers operate, particularly in terms of supporting greater spectrum efficiency or service innovation?”

AFC will fundamentally transform operations for WISPs and other providers in the 6 GHz band by allowing them to shift from static low-power class-licensed use to coordinated standard-power access via a standardized framework that protects incumbents while enabling superior coverage and capacity. The discussion paper highlights the key role WISPs play in delivering regional and remote connectivity. Operationally, AFC allows predictable outdoor (and high performance indoor) network planning, simplifying the ability for WISPs to improve support in underserved areas, while protecting incumbent users.

With regards to spectrum efficiency, AFC enables denser reuse than statically allocated spectrum by calculating interference-free operation via its five-step model (namely, registration, database query, protection calculations, assignments, and revalidation), maximising channels and permissible transmit power levels where incumbents are sparse. It also drives innovation by enabling high-capacity low-latency outdoor links for smart agriculture, industrial IoT, public safety, Wi-Fi 7’s 320 MHz channels, AR/VR, HD video, and backhaul, enhancing resilience and aligning with ACMA’s efficiency goals in regional/remote contexts. Through the higher power achieved by standard-power operations, fewer access points would be required to cover large residential or commercial spaces, reducing the cost of indoor deployments, particularly in regional areas with limited Wide-Area Wireless Broadband support.

Q3. “Are there any alternatives to AFC that could support dynamic and efficient frequency assignments in the 6 GHz band?”

AFC stands out as the most suitable spectrum-sharing mechanism for enabling standard-power unlicensed operation in the 6 GHz band shared with incumbents like fixed links, as the discussion paper positions it as a managed form of automated spectrum access using geolocation, authoritative incumbent databases, and propagation models to safely authorize higher-power wider-area deployments.

There are alternatives with certain limitations, for example,

- Fixed channel assignments are simple but inefficient, requiring oversized guard bands that waste spectrum amid variable incumbent usage.
- Static geolocation databases create rigid exclusion zones that either over-protect (shrinking unlicensed areas) or do not provide sufficient protection without device-specific dynamic adjustments.
- Fully decentralized DSA systems struggle with reliable scale, cooperation, and strict protection for high power operation, risking interference from implementation flaws.

By contrast, AFC’s centralized authoritative approach (drawing on current incumbent records, standardized protection calculations, per-device channel/power determinations, and periodic revalidation) delivers the automated database driven balance of efficient unlicensed access and high confidence incumbent protection that the discussion paper emphasizes as ideal for Australia’s 6 GHz context, outperforming less precise alternatives.

More importantly, AFC is already being adopted and supported by Wi-Fi vendors, in other, larger markets, such as the US and Canada. A different approach would create challenges for market adoption.

Q4. “Would established models in other jurisdictions such as the US and Canada, or aspects of these models, be appropriate for the Australian radiocommunications environment?”

IEEE 802 LMSC emphasizes that alignment with proven US and Canadian AFC models benefits unlicensed users and industry by leveraging established frameworks, as the ACMA discussion paper details the FCC’s decentralized market-driven US approach authorizing multiple commercial operators for 6 GHz AFC under baseline technical/protection rules that distribute costs, spur innovation/competition, and safeguard incumbents, alongside Canada’s ISED model which similarly accredits operators for the 5925 MHz to 6875 MHz frequency band. As previously noted, this harmonization enables manufacturers to design multi-market equipment, cutting R&D/certification costs for affordable Australian devices, accelerates local deployment via existing specs/tests/operations, and reduces uncertainty.

IEEE 802 LMSC recommends that, while adopting core principles, ACMA suitably customize recommended AFC models considering Australia’s unique fixed links, satellite stations, future broadband allocations, sparse regional WISPs, and distinct regulatory requirements, harmonizing with the existing AFC models for local protection criteria, processes, and ACMA interfaces as the discussion paper stresses, with ACMA’s preliminary view favouring industry-led AFC delivery within regulator-defined rules to balance flexibility, incumbent safeguards, competition, and sustainability.

Q5. “How much spectrum should be made available under AFC, and what bandwidths should be allocated to support individual AFC service offerings? Should part or all of the 6 GHz spectrum available for RLAN use be made available for AFC-enabled access by standard power devices, or is there a case for arrangements supporting a range of power levels above VLP/LPI and below/including standard power?”

IEEE 802 LMSC urges allocating the full 5925 MHz to 6585 MHz RLAN spectrum for AFC-enabled standard-power operation (i.e., 36 dBm EIRP) to support all Wi-Fi 6E and Wi-Fi 7 channel bandwidth sizes (i.e., 20 MHz and 40 MHz for compatibility, 80 MHz for throughput, 160 MHz for high performance, and 320 MHz for multi-gigabit services) including channel puncturing while providing incumbent fixed/satellite protection, avoiding sub-band segmentation that fragments channels and wastes capacity via guard bands.

UK Ofcom recently launched a consultation with a proposal that focuses on expanding access to the 6 GHz band for commercial mobile and Wi-Fi services with their AFC assisted unlicensed spectrum access approach.⁴

Instead of independent arrangements supporting a range of power levels, IEEE 802 LMSC recommends ACMA to retain VLP/LPI uncoordinated operation for basic Wi-Fi connectivity and to enable full standard-power AFC for enterprise/WISP range/capacity with dynamic safeguards.

⁴ Expanding access to the 6 GHz band for commercial mobile and Wi-Fi services, <https://www.ofcom.org.uk/spectrum/innovative-use-of-spectrum/consultation-expanding-access-to-the-6-ghz-band-for-commercial-mobile-and-wi-fi-services> [Last access: 16 January 2026]

Q6. “What degrees of geographic and spectrum segmentation should be considered when planning for individual AFC system deployments? For example, would planning for localised, self-contained areas or multiple sub-bands foster competition in the market for the provision of AFC services, or would that come at too much of a cost to spectrum efficiency (through the need for guard bands/spaces)?”

IEEE 802 LMSC favours a national unified AFC framework with multiple accredited operators under consistent standards over fragmented geographic domains, as localized setups would require guard/buffer zones that erode efficiency gains, while a unified approach assists with nationwide uniformity, simplifies device interoperability and deployment, and avoids complications for mobile unlicensed equipment crossing service boundaries. IEEE 802 LMSC believes that the implementation and computational complexity difference between a national AFC system and localised AFC systems is negligible.

Spectrum segmentation, geographic or spectral, threatens the ability to deploy wide-bandwidth channels (i.e., 160 MHz and 320 MHz) which are essential for high-performance Wi-Fi, in addition to demanding inefficient guard bands that shrink usable spectrum. On the contrary, a competitive AFC market within a unified national structure effectively fosters competition for delivering better service quality, preserves efficiency, maintains consistency, and aligns with ACMA’s preliminary view of industry-led delivery under regulator-defined rules, directly addressing the discussion paper’s question on whether localized/sub-band planning aids competition or costs too much efficiency.

Q7. “What are the respective roles and responsibilities for industry and government in realising an AFC regime? Should AFC be operated by industry under government-set rules or should government play a more direct role in providing AFC services?”

The governance model for AFC is central to its success and acceptance within the unlicensed community, and an industry-led model operating under rules set by government is generally preferred, consistent with ACMA’s preliminary position in the discussion paper. Under this approach, ACMA would establish the overarching regulatory framework and define the key technical specifications, including incumbent protection criteria, AFC system requirements and device compliance standards, as well as accrediting AFC system operators. Additionally, ACMA would audit the AFC systems’ compliance, enforce rules, maintain fair and non-discriminatory access to spectrum information, provide accurate and timely incumbent data, and put in place mechanisms for resolving disputes.

Within the ACMA framework, AFC operators drawn from industry would be responsible for designing, developing and operating the AFC platforms themselves, including the underlying databases, coordination algorithms and communications interfaces to devices, and for providing automated channel and power assignments to unlicensed equipment in accordance with ACMA’s protection rules and data requirements. They would also need to maintain system reliability, responsiveness and security so that coordinated access remains dependable for users and trustworthy from the perspective of incumbents whose operations must be protected.

An industry-led model offers several advantages: it leverages specialised expertise and innovation in the commercial sector; fosters competition among AFC providers that can drive improvements

in accuracy, responsiveness, and service features; allows faster adaptation to market and technology changes; scales more efficiently than a centrally run government system; and can reduce ongoing regulatory costs by shifting much of the operational burden to accredited operators.

Alternatively, a government-run AFC service, as a single public operator, may find it harder to keep pace with rapid technological evolution and diverse use cases, and it could become a single point of failure if technical or operational issues arise. Such a centralised approach may limit competition and innovation in AFC capabilities, which are important to supporting a broad range of unlicensed deployments while still meeting stringent incumbent-protection objectives.

Q8. “What role should databases such as the ACMA’s RRL or other coordination mechanisms, such as those administered by the ACMA but used by accredited assigners, play in the process?”

Databases such as ACMA’s Register of Radiocommunications Licences (RRL) serve as the foundational authoritative source of incumbent data for AFC systems, which must access the RRL or an optimised derivative to identify the locations and operating parameters of services such as fixed links and satellite earth stations that need to be safeguarded. AFC systems in the US and Canada update the incumbent information every 24 hours, so, daily updates to the RRL should be sufficient for successful AFC operations in Australia.

ACMA should ensure the data available in RRL is up-to-date and accurate for optimal protection of incumbent services. ACMA could follow a similar procedure to the existing “Register of Radiocommunications Licences (RRL)”⁵ where the licensees are asked to use the database to check if their own details are correct and reach out to ACMA in case of inaccuracies.

If ACMA plans to provide the incumbent characteristics data in an optimised format, we recommend ACMA follow the format provided in ISED’s Spectrum Management System (SMS), specifically “6 GHz band data extracts for AFC systems”⁶.

Q9. “What is the need for, and potential structure of, a tiered access model for incorporating standard power RLAN devices in the 6 GHz band?”

IEEE 802 LMSC strongly believes that there is no necessity to define tiers within unlicensed device categories such as standard power (SP), LPI, and VLP. SP devices are not higher tier but rather have similar access rights to LPI and VLP while having higher power limits. In our views, the only tiered access model exists between licensed incumbents and unlicensed users such as SP devices.

Q10. “With respect to licensing, should individual AFC-coordinated devices be registered on the RRL or covered by broader system-wide licensing arrangements, or are there other authorisation models that we should consider?”

Regarding the licensing of AFC-coordinated devices, the approach is crucial for maintaining the “unlicensed” nature of the 6 GHz band for end-users. Registering every individual AFC-

⁵ ACMA Register of Radiocommunications Licences (RRL), <https://www.acma.gov.au/register-radiocommunications-licences-rri> [Last accessed: 16 January 2026]

⁶ ISED Download SMS data, <https://ised-isde.canada.ca/site/spectrum-management-system/en/download-sms-data> [Last accessed: 16 January 2026]

coordinated device (e.g., every Wi-Fi access point (AP) or outdoor bridge) on ACMA's RRL would be an enormous administrative burden and fundamentally contradict the principle of unlicensed spectrum, which allows for mass-market deployment without individual user licensing. A device registration requirement would stifle innovation and adoption.

The more appropriate and widely accepted approach is through broader system-wide licensing arrangements. In this model, the AFC *system operators* themselves would be licensed or accredited by ACMA. These operators would then be responsible for managing the coordination process for the devices that connect to their system. Individual devices (e.g., Wi-Fi APs) would undergo a certification process to demonstrate compliance with technical standards for AFC interaction, power limits, and other operational rules, like equipment operating under the existing LIPD class license in Australia. The outlined process effectively creates a "licence-by-rule" framework for the devices, where they comply with a set of technical and operational rules (including interaction with AFC) without needing an individual licence. The LIPD class devices would "register" with an accredited AFC system to obtain channel assignments and transmit power restrictions, but this is distinct from formal ACMA licensing. The success of LIPD class licensed spectrum relies on ease of use and minimal regulatory burden for end-users, making it essential to avoid individual device licensing on the RRL for mass-market adoption and innovation in the 6 GHz band. The focus should be on regulating the AFC *systems* and certifying the *devices*.

In AFC systems operating in the US and Canada, SP devices are identified by their certification IDs and unique serial numbers. For each device, spectrum requests are stored in the AFC system which includes device's location, certification ID, serial number, and requested frequency range for operation.

Q11. "What processes and safeguards would need to be established to accredit, audit and ensure ongoing compliance of industry-led AFC operators? What type of rules should be imposed on prospective AFC operators and how should those rules be codified?"

Establishing robust processes and safeguards for accrediting, auditing, and ensuring the ongoing compliance of industry-led AFC operators is vital for the integrity and effectiveness of the AFC regime. The accreditation process would involve prospective AFC operators submitting detailed documentation of their system architecture, algorithms, security measures, and operational procedures for ACMA review. This would be followed by independent testing and validation, often by accredited labs, to verify the AFC system's ability to accurately protect incumbents and assign channels efficiently.

IEEE 802 LMSC recommends ACMA to utilize ISED Canada's DBS-06 standard⁷ as a strong example for Australia's AFC regulatory requirements. ISED rules are detailed and outline all aspects of AFC system certification, audit options, and operator responsibilities in detail which could potentially provide a solid foundation.

Q12. "What technical or administrative features (e.g., real-time geolocation, exclusion zones, device registration, database accuracy and latency) will be critical to the successful implementation of AFC?"

⁷ ISED DBS-06 — Automated Frequency Coordination (AFC) System Specifications for the 6 GHz (5925-6875 MHz) Frequency Band, <https://ised-isde.canada.ca/site/spectrum-management-telecommunications/en/devices-and-equipment/radio-equipment-standards/database-specifications-dbs/dbs-06-automated-frequency-coordination-afc-system-specifications-6-ghz-5925-6875-mhz-frequency-band> [Last accessed: 16 January 2026]

For fixed SP access points, periodic geolocation updates are not required. Location of such devices can only be changed if they are removed from power outlets and device power-cycles. Hence, geolocation needs to be updated only during initial power up of the device. If ACMA allows mobile AFC operations, more restrictive geolocation requirements could be defined.

Furthermore, we recommend ACMA allows flexible geolocation methods and not requires a single geolocation solution for all SP devices. Both in the US and Canada, devices are allowed to use any geolocation method as long as they properly specify location uncertainty that guarantees 95% confidence that is reported to the AFC system.⁸ Similar requirement would be suitable for Australia.

For other details of technical features, IEEE 802 LMSC recommend ACMA adopts requirements similar to the ones outlined in ISED/Canada's DBS-06 standard.

Q13. "How should data integrity, ownership, and update mechanisms be managed in AFC systems? Are ACMA's existing systems (such as the RRL) sufficient, or would changes or new systems be required to support real-time coordination?"

The management of data integrity, ownership, and update mechanisms is a critical aspect that underpins the entire AFC framework. Data integrity requires robust validation processes for all data entering the AFC system, particularly incumbent data from ACMA and location data from RLAN devices, along with error checking and redundancy strategies to prevent data loss. Regarding data ownership, ACMA would typically own the authoritative incumbent data from the RRL, with AFC operators licensed to access and use this data under strict conditions.

The reliability and responsiveness of AFC systems directly depend on the integrity and timeliness of this underlying data. Efficient data management ensures that unlicensed devices receive accurate channel assignments, minimizing interference, and maximizing available spectrum, leading to a more reliable deployment.

AFC systems could manage SP registration data. However, characteristics of licensed incumbents should be provided by ACMA. While API access to RRL could be useful, it is not necessary and either ftp or web access to the licensed information should be sufficient.

Under US and Canada regulations, AFC systems are required to access and download latest incumbent data once per day. Furthermore, each SP device accesses and downloads the latest channel availability from AFC system once per day. Beyond these daily updates, there is no need for "real time coordination" as incumbent data is typically updated well ahead of start of operation of registered links.

Q14. "What is the expected market for the provision of AFC services in Australia?"

The expected market for the provision of AFC services in Australia is anticipated to be competitive and dynamic, mirroring experiences in other jurisdictions that have implemented AFC. Potential participants in this market could include existing spectrum management companies, major cloud service providers leveraging their infrastructure to offer AFC as a service, specialized technology

⁸ FCC 47 CFR 15.407(k)(9)(i), [https://www.ecfr.gov/current/title-47/part-15#p-15.407\(k\)\(9\)\(i\)](https://www.ecfr.gov/current/title-47/part-15#p-15.407(k)(9)(i)) [Last accessed: 16 January 2026] ("A standard power access point and a fixed client device must include either an internal geo-location capability or an integrated capability to securely connect to an external geolocation devices or service, to automatically determine the standard power access point's geographic coordinates and location uncertainty (in meters), with a confidence level of 95%. The standard power access point and fixed client device must report such coordinates and location uncertainty to an AFC system at the time of activation from a power-off condition.")

companies focusing on spectrum sharing solutions, and even some large Wi-Fi equipment vendors who might offer their own AFC services or form close partnerships with AFC providers.

ACMA would likely accredit multiple AFC operators to foster competition, drive innovation, and ensure redundancy within the system. This competition is expected to lead to several benefits for the unlicensed user ecosystem, including potentially lower costs for AFC services, which would benefit device manufacturers and service providers, and ultimately translate to more competitive pricing for consumers. Furthermore, AFC operators would compete on factors such as system accuracy, reliability, response time, and customer support, leading to improved service quality. This competitive environment would also encourage continuous innovation in AFC technology and features. A healthy and competitive market for AFC services is thus highly beneficial for unlicensed users, ensuring that the critical function of spectrum coordination is performed efficiently, affordably, and reliably, thereby supporting the widespread deployment and use of AFC-enabled Wi-Fi devices.

Device ecosystem in the US and Canada includes outdoor P2P device manufacturers, enterprise network equipment suppliers, and residential internet providers. We expect AFC will be used to serve similar type of devices in Australia.

Q15. “What standards or other mandatory specifications should be prescribed to ensure AFC-enabled devices comply with operational rules (for example, GPS accuracy, firmware requirements, revalidation intervals)? What are the implications for manufacturers and operators?”

Prescribing clear standards and mandatory specifications is essential to ensure AFC-enabled devices comply with operational rules, which is vital for the safety and efficiency of the 6 GHz band for unlicensed users. These specifications would cover critical aspects such as geolocation capability (e.g., GPS) accuracy and reliability, requiring devices to meet stringent requirements for geolocation accuracy reporting to enable the AFC system to precisely determine their position for interference calculations, even in challenging environments like urban canyons.

Firmware requirements would dictate how the device’s firmware correctly implements AFC communication protocols, adheres to assigned power limits, operates on assigned channels, and respects exclusion zones, including secure boot and firmware update mechanisms.

Defined revalidation intervals would specify how frequently an AFC-enabled device must contact the AFC system to revalidate its channel assignments and power levels, ensuring adaptability to changes in incumbent links and characteristics. Standardized APIs and data formats for device-to-AFC communication would ensure interoperability between devices from different manufacturers and various AFC systems, while cryptographic measures would secure communication to prevent tampering.

These requirements have significant implications for manufacturers, who will need to integrate advanced geolocation capabilities, implement AFC communication stacks, and adherence to spectral masks in their device designs. This will necessitate rigorous testing and certification processes to demonstrate compliance, adding to development costs and time-to-market. Manufacturers must also implement robust mechanisms for secure firmware updates. For operators and unlicensed users, these standards mean they must procure AFC-certified devices and ensure they are correctly installed and configured to communicate with an accredited AFC system. They will also need to

manage firmware updates and monitor device compliance. Ultimately, well-defined and enforced standards are crucial for the success and reliability of AFC-enabled devices, ensuring they operate safely, efficiently, and without causing harmful interference, thereby providing a consistent and high-quality user experience for Wi-Fi and other unlicensed technologies.

Finally, IEEE 802 LMSC recommends ACMA to consider device certification models including Composite (LPI and SP) APs targeting indoor deployments and Dual (LPI and SP) Client devices starting from the early stages of device authorizations. These device types have been certified and deployed in other regulatory jurisdictions and have demonstrated interoperability which would benefit Australia as the SP and AFC authorizations are permitted. The latest IEEE 802.11 standard supports various regulatory modes in the 6 GHz band through its Regulatory Signaling protocol supporting regulatory interoperability of various modes such as LPI, SP, Indoor SP, and VLP.

Conclusion

IEEE 802 LMSC thanks ACMA for the opportunity to provide this comprehensive submission. The discussion paper represents a thorough and thoughtful examination of AFC implementation considerations for Australia. We respectfully ask ACMA to consider the principles outlined above in developing a comprehensive and forward-looking AFC framework that will enable the full potential of the 6 GHz band for unlicensed technologies in Australia.

The arguments presented here are strongly supported by and aligned with ACMA's detailed analysis in the discussion paper. IEEE 802 LMSC looks forward to continued collaboration with ACMA in realizing AFC for the benefit of Australian consumers, industry, and innovation.

Respectfully submitted,

By: /ss/.

James Gilb

IEEE 802 LAN/MAN Standards Committee Chairman

em: gilb_ieee@tuta.com