



Dell Global B.V. (Singapore Branch)

2 International Business Park  
The Strategy Tower 2, #01-34  
Singapore 609930  
Tel : +65-68236688  
Fax : +65-68291688  
www.dell.com

2 March 2023

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

**Sub : Consultation on Proposed Allocation of 6 GHz Band**

Dear Ms Aileen Chai,

- 1) The following proposal concerns the starting frequency for wireless communication in the range of 5945MHz. While we acknowledge that IMDA has reserved the 5925-5935MHz band for potential urban rail intelligent transportation systems, we note that IMDA typically follows international standards such as those set by the FCC or ETSI for assessment purposes. Therefore, the current specification for RF power, which is similar to that of the EU and meets the assessment criteria in EN 303 687, should be acceptable. However, it is worth noting that outside of the EU, the starting frequency for wireless communication is typically 5925MHz with a maximum power output of 25mW, which limits its application. Additionally, the current low-power specification is mainly used indoors, making it less of a concern to start the frequency from 5925MHz. For example, in Korea, a special product category was established to restrict the use of WiFi 6e in MRT systems, and IMDA could consider implementing similar restrictions for rail systems to mitigate potential impact.

Furthermore, the benefits of utilizing the full UNII5 range (5925-6425MHz) may become apparent when WiFi 7 is introduced to the market. The wider bandwidth (320MHz) available in WiFi 7 could be limited if the left wing of the band is restricted to a 20MHz channel, as per IMDA's current plan. While we understand the intended purpose of reserving the 5925-5945MHz range for different applications, it may be worthwhile to consider the low RF power limitations for LP and VLP, which are mainly used indoors and have even lower power outputs for outdoor use.



Dell Global B.V. (Singapore Branch)

2 International Business Park  
The Strategy Tower 2, #01-34  
Singapore 609930  
Tel : +65-68236688  
Fax : +65-68291688  
www.dell.com

- 2) We would like to inquire if IMDA has plans to develop an Automated Frequency Control (AFC) system or similar requirements that could facilitate the deployment of standard power applications for WiFi 6e, and potentially for future WiFi 7. Such a system could provide a more streamlined and efficient process for managing wireless communication frequencies, which could help to mitigate interference issues and ensure the effective use of available frequency bands. We kindly request that IMDA provide any information or updates regarding the development of such a system in the future.

Best regards,

A handwritten signature in blue ink, appearing to read "Go Kong Siang".

GOH KONG SIANG  
Regulatory Principal Engineer  
Dell Global B.V. (Singapore Branch)