



**MAIT Comments on Consultation Paper on  
Open and De-licensed use of Unused or Limited Used Spectrum Bands  
for Demand Generation for Limited Period in Tera Hertz Range**

Questions	Comments
Stakeholders are requested to provide responses to the following questions	
<b>Q1.</b> Whether there is a need for permitting license-exempt operations in 116-123 GHz, 174.8-182 GHz, 185-190 GHz, and 244-246 GHz frequency ranges? Please provide a detailed response with justification.	<p>Due to the limited distance propagation characteristics we believe that sub-THz bands are better suited for a licence-exempt regulatory framework. Unlicensed spectrum is a significant driver of the innovation that animates the market; it facilitates the most aggressive innovation by the largest number of parties.</p> <p>These bands provide a good basis, although minimal, to enable development above 95 GHz. However, we note that the ranges only allow up to 7.2 GHz of contiguous spectrum. The chance to enable wider channels, i.e. 20 GHz or more may be missed by limiting it to the bands shown here and not keep the door open for further wider frequency bands.</p> <p>We would also like to reference the recent work undertaken by the Electronic Communications Committee of the European Conference of Post and Telecommunications Administrations in enabling radar applications in the ranges which allow applications that were not possible before. Please see ECC Decision (22)03.</p>
<b>Q2.</b> In case it is decided to permit license-exempt operations in 116-123 GHz, 174.8-182 GHz, 185-190 GHz, and 244-246 GHz frequency ranges, what should be the terms and conditions including technical parameters for permitting license-exempt operations in these bands, while protecting both	<p>Request to kindly align with FCC rules. (see Part 15.258 "For operation in the bands 116–123 GHz, 174.8–182 GHz, 185–190 GHz)</p> <p>Kindly align with ERC 70-03 Annex 1, p for wider band of 244 - 246 GHz</p>
<b>Q3.</b> Whether there is a need for permitting license-exempt operations in any other bands in the 95 GHz to 3 THz frequency range? Please provide a detailed response with justification.	<p>The frequency bands listed in Q1 have limited bandwidth. The full potential of the 95 GHz to 3 THz frequency range can only be unleashed if wide bandwidth are being made available (20 GHz or more).</p> <p>We suggest to preserve regulatory flexibility in recognition of the difficulty of making predictions about the future path of technology and look into shared use with incumbents adjacent to these frequency ranges</p>
<b>Q4.</b> Whether there is a need for permitting license-exempt operation in 77-81	
<b>Q5.</b> In case it is decided to permit license-exempt operations in the 77-81 GHz	
<b>Q6.</b> Whether there is a need to open the frequency spectrum between 95 GHz to 3 THz for experiment and demonstration of equipment designed to operate on any frequency above 95 GHz through a separate experimental license? Please provide a detailed response with justification.	<p>Providing room to develop technologies at higher frequencies with larger bandwidths has the potential to significantly improve the fidelity of emerging technologies, supporting applications that are infeasible today.</p> <p>Please also see the answer to Q1</p>
<b>Q7.</b> In case it is decided to open the frequency spectrum between 95 GHz to	

(a) what should be the terms and conditions under such a license? Kindly provide inputs in respect of, inter alia, the following aspects for the proposed separate experimental license:	We suggest similar conditions as set out by FCC which would provide a strategy to preserve regulatory flexibility in recognition of the difficulty of making predictions about the future path of technology
i. Purpose of the license;	Please see Part 5 Subpart I for experimental licenses
ii. Scope of the license;	
iii. Eligibility conditions for entities seeking to acquire the license;	
iv. Mode of applying for the license;	
v. Duration of the license;	
vi. Obligation under the license;	
vii. Financial conditions including the license fees;	
viii. Technical conditions and other terms and conditions for operations under	
ix. Mechanism to ensure protection to passive services in the frequency range	
x. Any other (please specify).	
(b) whether the licensees should be permitted to market experimental devices	
<b>Q8.</b> Whether there are any other issues or inputs in respect of the frequency	