



June 29, 2021

To: radio.spectrum@mbie.govt.nz

Subject: Re: Consultation Submission – WLAN Use in the 6 GHz Band

Dear Sir/Madam:

EchoStar Global Australia Pty Ltd (EchoStar Global) submits these comments in response to the Radio Spectrum Management (RSM) New Zealand consultation titled *Planning for WLAN use in the 6 GHz band*. EchoStar Global, a subsidiary of EchoStar Corporation and a global satellite operator, is developing a global non-geostationary orbit Mobile Satellite Service (MSS) system in the 1980–2010 MHz and 2170–2200 MHz (2 GHz) bands, with its feeder links operating in the 5150–5250 MHz and 7025–7075 MHz bands.¹ EchoStar Global has actively participated in the New Zealand proceeding to enable the use of the 2 GHz band for MSS with a ground component and looks forward to future discussions so that it can ultimately provide its services to users across New Zealand.

Q2. What are your views on the potential future use of 6425 - 7125 MHz for new applications (e.g. Wi-Fi or IMT)?

EchoStar Global supports RSM's caution in proposing to not take any immediate action for the upper 6 GHz band (6425–7125 MHz). The consultation rightly notes that the band is still under review by the International Telecommunication Union (ITU), and relatively few actions have been taken by other international regulators.

Looking to the future, RSM should not permit any IMT use in this band. The upper 6 GHz band is very important for incumbent fixed satellite services, such as EchoStar's feeder link use in the 7025–7075 MHz band. Feeder links are essential to delivering service to end users. Allowing IMT operations in this band would create an unacceptable risk of harmful interference due to its ubiquitous, high-power use that would jeopardize services to New Zealand customers. In particular, aggregate interference from terrestrial services in fixed satellite services (including MSS feeder links)—whether those services are licensed or not—is a significant and growing concern.

Regarding indoor unlicensed use, RSM should remain cautious when considering opening the upper 6 GHz band to WLAN, recognizing that most countries have not permitted additional terrestrial use of the band. For example, in Europe, CEPT has focused on the lower 6 GHz band only and has not taken any action with regard to the upper 6 GHz band.² As the Consultation notes, Australia is also reserving judgment on the upper 6 GHz band pending further developments.

¹ EchoStar Global's affiliates, including EchoStar Mobile Limited in Europe, have extensive experience in providing MSS with a terrestrial component in the 2 GHz band. For more information, visit www.echostarmobile.com.

² CEPT, ECC Newsletter, [Europe prepares to harmonise the 6 GHz spectrum band for Radio Local Area Networks](#), Aug. 2019.

EchoStar Global appreciates the opportunity to comment on this consultation. We commend RSM's cautious approach toward allowing any additional terrestrial use in the upper 6 GHz band and look forward to future discussions on the matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer A. Manner', with a long horizontal stroke extending to the right.

Jennifer A. Manner
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