Comments from the Information Technology Industry Council (ITI) to the Public Consultation of Colombian Ministry of Information and Communication Technologies – MinTIC and Spectrum Agency – ANE

ITI appreciates the opportunity to contribute to the public consultation related to the definition of the technical aspects for the use of the 5,925 – 7,125 MHz ("6 GHz") band by restricted radiation systems ("license-exempt use"). We believe that opening the entire 6 GHz band to license-exempt use will bring substantial economic and societal benefits.

The Information Technology Industry Council (ITI) is the premier voice, advocate, and thought leader for the global information and communication technology (ICT) industry. Our member companies include the world's leading innovation companies, with headquarters worldwide and value chains distributed around the globe. One of the elements of our mission, in every economy in the world, is to position our companies to be genuine partners of government. ITI navigates the relationships between policymakers, companies, and non-governmental organizations, providing creative solutions that advance the development and use of technology around the world.

We applaud MinTIC and ANE's decision to fully allocate the 6 GHz band for license-exempt use by means of the employment of restricted radiation systems, as well as to support the proposed technical requirements allowing for the operation of low-power indoor (LPI) and very-low power (VLP) devices. By doing so, Colombia joins a number of countries in the region, including the United States, that have adopted or launched public discussions to open the entire 6 GHz band for license-exempt use.

MinTIC's alignment of its approach with other regulators makes this decision even more relevant. The allocation of the spectrum for unlicensed technologies can help Colombia become a hub for the development of emerging technologies and other industries reliant on broadband.

The COVID-19 pandemic has accelerated the process of digital transformation and has thrown into focus the need to have robust broadband connections for activities such as remote learning, tele-medicine, and teleworking. As MinTIC and ANE has acknowledged, making the entire 6 GHz band for licensed-exempt use puts Colombia in a leading position on the matter and has an enormous potential of transforming the country. As recognized by regulators throughout the globe, technologies such as Wi-Fi play an enormous role in enabling existing and new technologies to work and prosper. MinTIC's decision is an important step that grows the supply of unlicensed spectrum. Allowing new and innovative uses of the spectrum will not only help to bridge the digital divide but will advance education, healthcare, and the economy in general. By allowing the unlicensed use of the 6 GHz band by restricted radiation systems, Colombia is taking a big step towards its digital transformation. Doing so enables low-cost broadband access and provides consumers and companies the opportunity to take advantage of innovative technology, thus enhancing their broadband experience.

ITI also takes this opportunity to encourage MinTIC and ANE to continue working on the matter and to consider opening the band, in the near future, for standard power devices, drawing on the recent work of the US FCC, and on other assessments carried out by other regulators (Canada's ISED, for example). While we understand that putting in place mechanisms to allow coexistence with / protection of incumbent services, such as Automated Frequencies Coordination (AFC), is not

effortless, allowing for standard power devices to operate in the 6 GHz band would deliver to Brazil more value from the license-exempt use of the spectrum.

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We appreciate ANE's attention to the above considerations. ITI applauds ANE's decision to open the entire 6 GHz band for license-exempt use and urges the Agency to move promptly to finalizing rules.

Sincerely,

Ashley E. Friedman
Senior Director of Policy