



Mr. Valdis Dombrovskis
Executive Vice-President, European Commission
Mr. Thierry Breton
Commissioner for Internal Market, European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

October 5, 2023

VIA EMAIL: cab-dombrovskis-contact@ec.europa.eu; cab-breton-contact@ec.europa.eu

Regarding: China's MIIT proposed regulations of radio management on UWB equipment

Dear Executive Vice-President Dombrovskis and Commissioner Breton,

The Ultra Wide Band Alliance (UWB Alliance) is grateful to the European Commission for the opportunity to reply and comment on the impact of the People's Republic of China MIIT's proposed regulations on European industry, and the potential trade barriers they present. **Specifically, the UWB Alliance has strong concerns that the MIIT's proposed regulations finding a new maximum value of 650 MHz for the 10 dB bandwidth will foreclose several European UWB manufacturers from trading in the Chinese market.**

As a global organization, the UWB Alliance is squarely focused on harmonizing international standards for the UWB ecosystem so that manufacturers around the world can create the best products for all markets. The proposed Chinese UWB regulations differ significantly from the rest of the world for no substantiated purpose. In doing so, it creates a lack of interoperability, requiring European companies to either engineer special products for the Chinese market or be barred from entry. This will harm manufacturers' market for sensing applications – including material sensing – as well as high accuracy ranging using bandwidths of 1 GHz or more.

We are opposed to the 650 MHz upper limit on the 10 dB bandwidths. No other country has an upper limit on 10 dB bandwidth. There is no technical need for this limitation as it will exclude systems that use the wider bandwidth, in particular radar and sensing applications but also high precision ranging using IEEE HRP UWB PHY Channel 11.

We don't see the need to reduce the spectrum available to UWB. The current 6-9 GHz allocation is compatible with IMT use in the 6 GHz spectrum. UWB already coexists successfully with IMT in lower parts of the spectrum in many regions, including Europe. Extra bandwidth availability will give UWB more opportunity to avoid occupied parts of the spectrum.

There is no evidence of interference. It is speculated that this effort is to prevent interference with IMT at 6 GHz as the Chinese seek to create a market internally. At this time, there have been no *replicable*

studies showing any such interference. To the contrary, there are studies – reputable and replicable – that show no interference with IMT at 6 GHz.¹

We respectfully recommend the European Commission recognize this as violative of the WTO Agreement on Technical Barriers to Trade, and to urge the WTO to oppose the MIIT proposed regulation to place an upper limit on the 10 dB bandwidth.

Sincerely,

Tim Harrington,
Chairman
Ultra Wide Band Alliance

¹ See, International Telecommunications Union, Radiocommunication Study Groups Document 1A/XX-E, [Compatibility Studies Between UWB Devices and IMT-2020 Indoor Small Cells Networks in the Frequency Band 6 425-7 125 MHz](#), 17 May 2023.