Comments of the

Ultra Wide Band (UWB) Alliance

to the

Radio Spectrum Policy Group

on

PUBLIC CONSULTATION

DRAFT Opinion on WRC-27.

About the UWB Alliance

The Ultra Wide Band (UWB) Alliance is a global not-for-profit organization that works to collectively establish ultra-wideband (UWB) technology as an open-standards industry. A coalition made up of vendors that either design, manufacture, or sell products that use ultra-wideband technology, the UWB Alliance aims to promote and preserve the current allocation of bandwidth as well as promote the continuing globalization of the technology. As part of our mission, we advocate UWB technology and use cases to promote verticals showing the value of UWB for IoT and Industry 4.0 and to build a global ecosystem across the complete UWB value chain, from silicon to service. In addition, the Alliance is promoting and assuring interoperability through its work with Standards Development Organizations such as the IEEE and ETSI and then working with members to define upper layers and testing to assure compliance. For more information, please visit us at www.UWBAlliance.org.

Dear Sir, Madam,

The Ultra Wide Band (UWB) Alliance appreciates the opportunity to submit comments to RSPG's public consultation on the draft opinion on WRC-27 (RSPG26-017 FINAL).

UWB is the only technology that can provide secure distance bounding, making it indispensable for preventing relay attacks in vehicle access systems and other security-critical applications. This distinctive security feature, combined with its superior spatial accuracy and low latency, has driven widespread adoption by leading vehicle manufacturers and smartphone producers.

A key advantage of UWB technology lies in its ability to operate effectively within spectrum already allocated to other radio technologies without causing harmful interference, due to its low power spectral density characteristics. In an era of increasing spectrum scarcity and growing demand for wireless services, UWB's inherent spectrum-sharing capabilities represent an exemplary model for efficient spectrum utilization.

The UWB Alliance appreciates the recognition of UWB's capabilities and the need to preserve those as expressed in the draft opinion. An IMT identification in the 4.4-4.8 GHz and 7.250-8.400 GHz would encumber many of the existing deployments and cause out-of-band interference to UWB applications well beyond the boundaries of these frequency ranges. Preserving IEEE HRP channel 9 is critical, but as a coexisting underlay system, most UWB applications require alternative channels to function reliably. There are systems and devices in operation in all the available UWB spectrum, there are applications between 3.1-4.8 GHz and 6-8.5 GHz based on ECC/DEC/(06)04 or between 2.1 – 8.5 GHz based on ECC/DEC/(07)01.

The UWB Alliance therefore wholeheartedly supports the recommendation to oppose an IMT identification in the bands 4.4-4.8 GHz and 7.250-8.400 GHz.

Respectfully submitted,

Tim Harrington

President

Ultra Wide Band (UWB) Alliance