

04.12.2023

C-PRAV's comments on E and V bands

We thank you for giving us this opportunity to submit our comments for the TRAI Consultation Paper No. 22/dated 27th September 2023 on Assignment of Spectrum in E & V bands.

Issues for Consultation

Q45. Whether it is feasible to allow low powered indoor consumer device-to-consumer device usages on license-exempt basis in V-band (57-64 GHz), in parallel to use of the auction acquired spectrum by telecom service providers for establishment of terrestrial and/ or satellite-based telecom networks? If yes, whether it should be permitted? Kindly justify your response.

Q46. In case it is decided to allow low powered indoor consumer device-to-consumer device usages on license-exempt basis in V-band (57-64 GHz), (a) Whether it should be permitted in entire band or part of the band? Kindly provide detailed response including the frequency

carriers, which should be considered for license exemption with justification.

(b) Whether there is a need to define such indoor use? If yes, what should be the definition for such indoor use?

(c) What technical parameters should be prescribed including EIRP limits? Suggestions may kindly be made with supporting justification and international scenario

C-PRAV's Comments: Yes, entire band of 57-64 GHz will be required to be permitted under de-licensed category as these devices operate in a very low power (20dBm) and used in various end consumer applications.

There has been a lot of interest from the industry for 60GHz (V band) with numerous technology products ready to be exported to and sold in India.

If these bands are licensed, Manufacturers are not able to sell the products in India. These low power products are tested to European standard ETSI EN 305 550.

There is a SRD WPC Gazette (GSR 1047 E dated 18.10.2018) which lists a part of this band 61 to 61.5 GHz to comply with this ETSI EN 305 550.

Being a low power device and allowed as a de-licensed band by most countries across the globe, this band should be under de-licensed category based on the power limits, thus creating an opportunity for the Short-Range Devices to be sold in India with ETA SD, otherwise this technology will be unusable in India.

Eg: wireless mouse, Keyboard or any SRD regardless of the application or purpose which meets the technical specifications

Q.47. Any other suggestions relevant to assignment of spectrum in E-band (71-76/81-86 GHz) and V-band (57-64 GHz) may kindly be made with detailed justification.

C-PRAV's comments: On the same note 71-76 and 81-86 GHz for low power devices may be permitted under de-licensed category.

Praveen Rao

CEO, Technical Director, C-PRAV Group
C-PRAV Labs and Certifications