

October 27, 2025

To,
Respected Shri Akhilesh Kumar Trivedi,
Advisor (Networks, Spectrum and Licensing),
Telecom Regulatory Authority of India

ITI Recommendations for the Consultation Paper on the Auction of Radio Frequency Spectrum in the Frequency Bands Identified for International Mobile Telecommunications (IMT), 2025

The Information Technology Industry Council (ITI) is the premier global advocate and thought leader for the information and communications technology industry. ITI's membership comprises leading technology and innovation companies from across the tech sector, including software, digital services, and internet companies. Our members are headquartered across Asia, the United States, and Europe, and many are significant investors and employers in India.

In the Telecom Regulatory Authority of India (TRAI)'s September 30 *Consultation Paper on the Auction of Radio Frequency Spectrum in the Frequency Bands Identified for International Mobile Telecommunications (IMT)*, TRAI requests comment on "Whether the spectrum in 6425-6725 MHz and 7025-7125 MHz ranges in the upper 6 GHz band should be put to auction for IMT in the forthcoming auction?" (Q14, p. 119). In response to this question, ITI would like to reiterate our previous position regarding the 6 GHz band and urge further consideration of a spectrum sharing framework and other relevant industry dynamics before making a decision to put these ranges up for auction.

ITI would like to reemphasize the importance of increasing access to unlicensed spectrum in India. As noted in our June 2025 comments on *Use of Low Power and Very Low Power Wireless Access System including Radio Local Area Network in Lower 6 GHz band (Exemption from Licensing Requirement) Rules*, ITI appreciates the Government of India's decision to de-license the lower 6 GHz band (5925-6425 MHz). Increasing access to unlicensed spectrum in India will bring unprecedented connectivity, allowing high-density population centers to experience fewer service interruptions and faster speeds. This decision aligns India with over 100 countries that have already opened this portion of the 6 GHz band for unlicensed use, including the United States, the United Kingdom, South Korea, Japan, Australia, the EU, and most ASEAN member states. **While ITI maintains its interest in seeing the entire 6 GHz band de-licensed, we encourage the Government of India to promptly issue the final rule de-licensing the lower 6 GHz band as soon as possible, allowing India to take advantage of innovative technologies already on the market and provide clarity to industry operating in India.**

Upon issuance of the final rule, we also urge the Government of India to consider our previous recommendation to de-license an additional 160 MHz (5925-6585 MHz) of the 6

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GHz band rather than put this range up for auction. A total of 660 MHz in the 6 GHz band designated for de-licensed use would allow at least two 320 MHz-wide channels to be used simultaneously for high-speed applications and data usage. This also allows flexibility in channel bandwidths choices – 320 MHz, 160 MHz, and 80 MHz – which can be used for deployment of advanced Wi-Fi technologies such as Wi-Fi 6E, Wi-Fi 7 and beyond. For example, a band-split at 6585 MHz provides at least 160 MHz of additional de-licensed spectrum, suitable for both Low Power Indoor (LPI) and Very Low Power (VLP) indoor and outdoor use. We note that Australia recently formalized its decision to allocate the 6425-6585 MHz range for de-licensed use in addition to their lower de-licensed 6 GHz band, noting that the 6585 MHz boundary enabled wider channels vital for performance and standards already supported device availability.¹

Should the Government of India remain interested in allocating any portion of the upper 6 GHz band for IMT use, ITI also encourages consideration of options for a spectrum sharing framework and assessment of relevant industry dynamics. Adopting a shared framework that enables both licensed and de-licensed access to the upper 6 GHz band instead of exclusively allocating the upper 6 GHz band for IMT would ensure the spectrum is used efficiently while supporting the rapidly growing demand for wireless connectivity, innovation, and digital inclusion. Additionally, at present, device and infrastructure ecosystems for IMT use in the upper 6 GHz range remain limited, and a 5G-based deployment in this range now would require significant network upgrades within four years to accommodate 6G capabilities, leading to inefficiency and duplication of costs. Deferring auction would allow India to take advantage of more mature device ecosystems and the latest technology standards.

We look forward to continuing to engage with the Government of India on this topic and thank you for the opportunity to provide feedback on this consultation.

Respectfully submitted,

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¹ https://www.acma.gov.au/sites/default/files/2025-09/outcomes_paper_remaking_the_lipd_class_licence.pdf