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# **Jordan Open Source Association (JOSA) Response to the Request for Additional Notes on Amending the Instructions and Conditions for Licensing and Operating Radio Local Area Networks**

Submitted by the Jordan Open Source Association (JOSA) to the  
Telecommunications Regulatory Commission (TRC)

## Summary

The Jordan Open Source Association (JOSA) fully supports the TRC’s efforts to expand the range of frequencies designated for license-exempt use.

The COVID-19 pandemic confirmed that Wi-Fi is tremendously important in the everyday life of Jordanians. We welcome the amendments proposed by Telecommunications Regulatory Commission (TRC) ’s to add license-exempt frequency bands which will result in improved Wi-Fi performance and better, cost-effective Internet access.

JOSA strongly encourages opening the full 6 GHz band (5925-7125 MHz) for license-exempt usage and strongly recommends reviewing power output levels for Wi-Fi, increasing transmit power level, necessary for future WAS/RLAN technologies and Wi-Fi 7.

## Detailed Comments

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### **General Comments**

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JOSA fully supports the TRC’s objective to expand the range of frequencies designated for license-exempt use. Specifically, JOSA is pleased that the TRC is taking —as a frontrunner— an important step in relation to the 6 GHz frequency range, and we strongly support TRC’s advancement to open the 5925-6425 MHz frequency range on a

license-exempt regulatory basis for RLAN and Wi-Fi 6E.

JOSA welcomes these efforts, and as a Jordanian organization that promotes *Open Spectrum* principles, we believe that allocating more license-exempt spectrum is beneficial for the Jordanian society and economy, as additional connectivity will increase social and economic inclusion.

Moreover, JOSA recognizes there is a growing demand for spectrum access, and the current spectrum availability for WLAN in the 2.4 GHz and 5GHz bands will soon be insufficient. In that regard, we consider the principles of technology and service neutrality as imperative.

Additionally, JOSA stresses on the fact that, for Jordanians, Wi-Fi is actually the most cost-effective method to get online. The COVID-19 pandemic proved that wireless services were of immense importance in the everyday lives of Jordanians, who relied on their Wi-Fi for accessing education and work from home without incurring the high connectivity charges associated with cellular contracts.

The rapid growth in the use of license-exempt spectrum in the form of Wi-Fi also demonstrates the strength of continuous innovation in the field and the need for inexpensive Internet access. We believe that the success of Wi-Fi encourages the expansion of license-exempt regulation to more frequency bands in the future. We invite the TRC to capitalize on this by increasing access to additional license-exempt spectrum and therefore decreasing the costs associated with its usage.

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**Upper  
6 GHz Band**

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**JOSA strongly encourages opening the full 6 GHz band (5925-7125 MHz) for license-exempt usage.**

JOSA believes that making the entire 5925-7125 MHz band license-exempt will provide major benefits for users in Jordan; we encourage the TRC to consider allowing Wi-Fi to operate in the entire 1200 MHz.

The upper 6 GHz band (6425-7125 MHz) will allow for the full potential of future WAS/RLAN technologies and it will be necessary for the next generation of Wi-Fi, also known as Wi-Fi 7 (*IEEE 802.11be*), with channel bandwidths of 320 MHz, allowing the delivery of high-bandwidth services, including real-time video.

As of December 2021, several countries have adopted the full 6 GHz band, including the United States, Canada and Saudi Arabia, in addition to other countries like Brazil, Chile, Costa Rica, Guatemala, Honduras and South Korea. We express our concerns that not making the full 6 GHz band available for Wi-Fi could affect Jordanians, as citizens and industries will not be able to benefit from the quality and performance of the same products and services available in other countries.

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**Transmit Power  
Levels**

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**JOSA strongly recommends reviewing power output levels for Wi-Fi, increasing transmit power levels.**

JOSA supports the TRC's proposal for different categories of devices to operate in the 6GHz band, with both Low Power Indoor (LPI) and Very

Low Power (VLP) access points.

JOSA recognizes that the allowed power output levels for Wi-Fi vary substantially across countries, however, the EIRP values suggested by the TRC (i.e. 23 dBm for indoor) show a very conservative approach with unnecessarily restrictive power limits for Wi-Fi.

JOSA invites the TRC to reconsider the power levels, recognising the reduced chances of interference, and to increase EIRP for indoor (LPI) to 30 dBm.

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