



November 09, 2023

TO: US WRC representatives:

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OSTP: Austin Bonner, Elizabeth.A.Bonner@ostp.eop.gov

Dear WRC representatives,

On behalf of the 218 member companies of the [Car Connectivity Consortium](#) (see attached), we call to your attention the matter of proposals identifying more bands for 5G and 6G cellular telephony (IMT) in the 7-24 GHz band, particularly in the 7.7 – 9.3 GHz portion, which we understand will be discussed at the upcoming World Radiocommunication Conference beginning on November 20, 2023.

As an organization that represents the vast majority of participants in the vehicle and device community worldwide, we object to the use of 6G in the range 7.7 - 9.3 GHz. We rely on this portion of the spectrum for Ultra-Wide Band (UWB) which is a critical technology used in our CCC Digital Key specification and certification program. More than two decades of UWB operations in this band is a spectrum-sharing success story, with UWB long coexisting with many other uses in its frequencies.

The digital key embedded in cars and smart devices is one important UWB application that has already been commercialised which relies heavily on UWB Channel 9 (7.7 - 8.3 GHz). CCC Digital Key securely and conveniently enables the normal lock, unlock, and start engine functions, as well as going further to allow key sharing, offering secure access to family, friends or valets, and many more features via consumer's phones and other devices.

Put simply, innovative security and safety features in our members' cars would be made obsolete if IMT is authorized to operate in the UWB range. Interference generated from IMT technologies in the band would render automotive features using the same spectrum unusable. The automotive interest in UWB is paramount, not only for this application, but also for use cases the CCC is developing for the future. Losing these capabilities would limit consumer choice and negatively impact their experience.

The CCC strongly recommends that investigations into spectrum for IMT do not consider the spectrum range which includes UWB channels 9, 10 and 12 (7.7 - 9.3 GHz). Furthermore, CCC supports the US decision to avoid allocation of IMT coinciding with UWB Channel 5 (6.2-6.8 GHz). We appreciate your consideration of our recommendation.

The Car Connectivity Consortium Board of Directors,

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Daniel Knobloch, BMW

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