

ANACOM:  
Av. José Malhoa, 12  
1099-017 Lisboa (Lisbon)  
Portugal  
Date; 12 novembre 2008

Dear Sir / Madam,

**WiMedia response to ANACOM  
on  
draft revision of the National Frequency Allocation Plan (NFAP).**

WiMedia® is the only standards approved radio platform for ultra-wideband (UWB) wireless networking. With efficient power consumption and high data rates, WiMedia UWB has been selected by the Bluetooth SIG and the USB Implementers Forum as the foundation radio of their high-speed wireless specifications for use in next generation consumer electronics, mobile and computer applications. Over 350+ international member corporations and research institutions support the non-profit WiMedia Alliance, developing specifications, certification tests, and educational programs. The WiMedia PHY, MAC, and MAC-PHY Interface specifications have been ratified by ECMA and ISO/IEC.

With many of the WiMedia Alliance members actively preparing products and OEM devices for the European market, ANACOM's inclusion of the EC decision of 21/02/07<sup>1</sup> in the NFAP will ensure that Portuguese industry and consumers benefit from this innovative technology at the earliest opportunity.

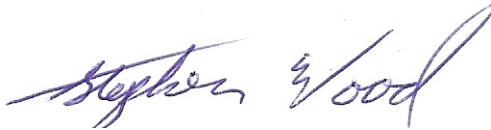
The WiMedia Alliance notes that this regulation covers the 'phased approach' period until 31/12/2010 which facilitates market access for UWB devices which do not implement mitigation techniques. The WiMedia Alliance has been, and continues to be actively involved in defining technical requirements and the necessary test specifications for mitigation techniques such as Detect and Avoid (DAA) which will further improve spectrum capacity, management and co-existence for the benefit of all spectrum users beyond the phased approach and looks forward to continued support from ANACOM and other European administrations.

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<sup>1</sup> <http://www.erodocdb.dk/docs/doc98/Official/Pdf/2007131EC.pdf>

Finally, the WiMedia Alliance would like to draw ANACOM's attention to recent developments in CEPT TG3. The WiMedia Alliance understands that CEPT TG3 has approved raising the baseline emissions limits between 2.7-3.8 GHz (please refer to table in Annex 1 of document ECC/DEC/(06)04<sup>2</sup>) and completed defining technical requirements for Low Duty Cycle (LDC) and DAA in both 3.1-4.8 GHz and 8.5-9 GHz bands.<sup>2 3</sup> These updates will be reflected in the next EC decision (expected date: May 2009), and we would encourage ANACOM to act quickly to amend their regulations as soon as possible thereafter.

Yours faithfully,



Stephen Wood  
President, WiMedia Alliance

<sup>2</sup> <http://www.erodocdb.dk/Docs/doc98/official/pdf/ECCDEC0604.PDF>

<sup>3</sup> <http://www.erodocdb.dk/docs/doc98/Official/Pdf/ECCDec0612.pdf>