

FORMAT FOR PARTICIPATING IN THE PUBLIC CONSULTATION

Instructions for filling out and participating:

- I. Opinions, comments and proposals should be sent to the following email address: planeacion.espectro@ift.org.mx, where it should be noted that the maximum capacity for receiving files is 25 MB.
- II. Provide your full name (first and last name), company name or trade name, or the full name (first and last name) of the person acting as legal representative. In the latter case, you must choose from the options the type of document with which you prove said representation, as well as attach –to the same email address– a legible electronic copy of it.
- III. Please read the **PRIVACY NOTICE** carefully regarding the care and protection of your personal data, as well as the publicity that will be given to the comments, opinions and contributions presented by you in this consultative process.
- IV. Please provide your comments according to the structure of Section II of this form.
- V. If you have general comments or any additional contributions, please provide them in section III of this form (last box).
- VI. If you are interested, you can attach any documentation you deem appropriate to your email.
- VII. The Public Consultation period will be from August 23, 2024 to September 20, 2024 (i.e. 20 business days). Once this period has concluded, the comments submitted, as well as the attached documents, may continue to be viewed at the following electronic address: <http://www.ift.org.mx/industria/consultas-publicas>
- VIII. For any questions, comments or concerns regarding this consultative process, the Institute makes the following contact points available: Juan Pablo Rocha López, Director of Spectrum Attributions, email: juan.rocha@ift.org.mx, telephone number 55 5015 4000, extension 2726; Deivít Andrés Andrade Hernández, Deputy Director of Spectrum Use Determination, email: deivít.andrade@ift.org.mx, telephone number 55 5015 4836; and Esthephanie Marisela Alvarez Martínez, Head of the Department of Analysis and Monitoring of Spectrum Opinion Requests, email: esthephanie.alvarez@ift.org.mx, telephone number 55 5015 4000, extension 2185.

I. Data of the participant	
Name, reason or corporate name:	
If applicable, name of the person acting as legal representative :	Edward Au
Document for accreditation of representation: If you have a person acting as a legal representative, attach a digital copy of the document that accredits said representation, via email.	Elija un elemento.
PRIVACY NOTICE FOR PERSONAL DATA COLLECTED BY THE FEDERAL TELECOMMUNICATIONS INSTITUTE THROUGH THE RADIOELECTRIC SPECTRUM UNIT	
<p>In compliance with the provisions of articles 3, section II, 16, 17, 18, 21, 25, 26, 27 and 28 of the General Law on the Protection of Personal Data Held by Obligated Subjects (hereinafter, the "LGPDPSSO"); 9, section II, 15 and 26 to 45 of the General Guidelines for the Protection of Personal Data for the Public Sector (hereinafter the "General Guidelines"); 11 of the Guidelines that establish the parameters, modalities and procedures for the portability of personal data (hereinafter the "Portability Guidelines"), numeral XIV, point 7, of the Internal Policy for the Management and Processing of Personal Data of the Federal Telecommunications Institute, the following Comprehensive Privacy Notice is made available to the owners of personal data:</p> <p>I. Name of the person responsible Federal Telecommunications Institute (hereinafter, the "IFT").</p> <p>II. Address of the person responsible Insurgentes Sur Avenue #1143, Nochebuena Neighborhood, Benito Juárez Territorial Demarcation, Postal Code 03720, Mexico City.</p> <p>III. Personal data that will be subject to processing, identifying those that are sensitive The personal data that the IFT collects, through the Radioelectric Spectrum Unit, are the following:</p> <ul style="list-style-type: none"> • <i>Identification data: Full name of natural persons, where applicable, full name of legal representative.</i> • <i>Contact information: Email address.</i> • <i>Employment data: Documents proving the identity of the legal representative of individuals and legal entities.</i> <p>It is noted that in terms of article 3, section X of the LGPDPSO, none of the above corresponds to sensitive personal data.</p> <p>IV. Legal basis that authorizes the controller to carry out the processing</p>	

The IFT, through the Radioelectric Spectrum Unit, carries out the processing of the personal data mentioned in the previous section, in accordance with articles 15, sections XL and XLI, 51 of the Federal Telecommunications and Broadcasting Law, last modification published in the Official Gazette of the Federation on April 1, 2024, 12, section XXII, second and third paragraphs and 138 of the Federal Economic Competition Law, last modification published in the Official Gazette of the Federation on May 20, 2021, as well as the Eighth Guideline of the Public Consultation Guidelines and Regulatory Impact Analysis of the Federal Telecommunications Institute, published in the Official Gazette of the Federation on November 8, 2017, Articles 19, 20, section XXII and 75 of the Organic Statute of the Federal Telecommunications Institute, last modification published in the Official Gazette of the Federation on March 18, 2022; collected in the exercise of its functions.

V. Purposes of the treatment

The personal data collected by the IFT will be protected, incorporated and safeguarded specifically in the files of the Radioelectric Spectrum Unit, and will be treated in accordance with the following specific, lawful, explicit and legitimate purposes:

Personal data	Purpose of the treatment
A. Identification data (full name of natural persons, if applicable, full name of legal representative)	Fully disclose the documentation regarding comments, opinions and/or contributions arising from the participation of individuals in the Public Consultation processes carried out by the IFT.
B. Contact details (email address)	Fully disclose the documentation regarding comments, opinions and/or contributions arising from the participation of individuals in the Public Consultation processes carried out by the IFT. Inform the IFT, through the email address provided for this purpose, of your participation in the Public Consultation processes.
C. Employment data (documents proving the identity of the legal representative of individuals and corporations)	To prove the identity of the interested party in the event that comments, opinions and/or contributions, or other elements of the consultative processes are presented by the interested parties through a legal representative.

VI. Information regarding transfers of personal data requiring consent

The Radioelectric Spectrum Unit will not process personal data for purposes other than those expressly stated in this privacy notice, nor will it transfer personal data to other responsible parties, whether public or private, except for those that are strictly necessary to meet information requests from a competent authority, which are duly founded and motivated, or when any of the assumptions provided for in articles 22 and 70 of the LGPDPSO are updated. Such transfers will not require the consent of the owner to be carried out.

VII. Mechanisms and means available to the owner, if applicable, to express his or her refusal to the processing of his or her personal data for purposes and transfers of personal data that require the owner's consent

In accordance with the provisions of section VI of this privacy notice, please be advised that the personal data collected will not be subject to transfers that require the consent of the owner. However, should the owner have any questions regarding the processing of their personal data, as well as the mechanisms to exercise their rights, they may contact the IFT Transparency Unit, located at Avenida Insurgentes Sur #1143 (Headquarters Building), Ground Floor, Colonia Nochebuena, Benito Juárez Territorial Demarcation, Postal Code 03720, Mexico City, or send an email to the following address: unidad.transparencia@ift.org.mx, or even call 55 5015 4000, extensions 4688, 2321 and 2205.

VIII. The mechanisms, means and procedures available to exercise ARCO rights (rights of access, rectification, cancellation and opposition to the processing of personal data)

Applications for the exercise of ARCO rights must be submitted to the IFT Transparency Unit, through free writing, forms, electronic means or any other means established by the National Institute for Transparency, Access to Information and Protection of Personal Data (hereinafter the "INAI").

The procedure will be governed by the provisions of articles 48 to 56 of the LGPDPSO, as well as in numerals 73 to 107 of the General Guidelines, as well as what is indicated in the Internal Procedure to guarantee the exercise of the Rights of Access, Rectification, Cancellation, Opposition and Portability of Personal Data exercised before the Federal Telecommunications Institute¹, in accordance with the following:

- a) The requirements that the application must contain for the exercise of ARCO rights.
- Name of the holder and his/her address or any other means to receive notifications;
 - Documents proving the identity of the holder and, where applicable, the personality and identity of his representative;
 - If possible, the responsible area that processes the personal data and to which the request is submitted;
 - The clear and precise description of the personal data in respect of which you seek to exercise any of the ARCO rights;

¹ Available for consultation at: https://www.ift.org.mx/sites/default/files/OPNT/LGPDPSO/3_M_ARCO/Criterio_3_1_1.zip

- The description of the ARCO right that is intended to be exercised, or what the owner requests, and
- Any other element or document that facilitates the location of personal data, if applicable.

b) The means through which the owner may submit requests for the exercise of ARCO rights.

The means are established in the eighth paragraph of article 52 of the LGPDPPSO, which states the following: Requests for the exercise of ARCO rights must be submitted to the Transparency Unit of the person responsible, which the owner considers competent, through free writing, formats, electronic means or any other means established for this purpose by the INAI.

c) The forms, systems and other simplified means that, where appropriate, the INAI has established to facilitate the exercise of the ARCO rights of the holder.

The forms that the INAI has developed for the exercise of ARCO rights are available on its Internet portal <https://home.inai.org.mx/>, in the section "Protection of Personal Data" / "Enter your request or complaint" / "Formats" / "In the public sector" / "[ARCO rights Request Form for the Public Sector](#)".

d) The means enabled to respond to requests for the exercise of ARCO rights.

In accordance with the provisions of article 90 of the General Guidelines, the response adopted by the responsible party may be notified to the owner in its Transparency Unit or in the offices it has enabled for this purpose, after proving its identity and, where appropriate, the identity and personality of its representative in person, or by the National Transparency Platform or certified mail, in which case notification through a representative will not be appropriate for these last two means.

e) The modality or means of reproducing personal data.

According to the provisions of article 92 of the General Guidelines, the modality or means of reproduction of personal data will be through direct consultation, at the site where they are located, or through the issuance of simple copies, certified copies, magnetic, optical, sound, visual or holographic media, or any other technology determined by the owner.

f) The time limits established within the procedure - which must not contravene the provisions of articles 51, 52, 53 and 54 of the LGPDPPSO - are the following:

The controller must establish simple procedures that allow the exercise of ARCO rights, the response period for which must not exceed twenty days from the day following receipt of the request.

The period referred to in the previous paragraph may be extended once for up to ten days when justified by the circumstances, and provided that the owner is notified within the response period.

If the exercise of ARCO rights is appropriate, the person responsible must do so within a period that may not exceed fifteen days from the day after the response has been notified to the owner.

In the event that the data protection request does not satisfy any of the requirements referred to in the fourth paragraph of article 52 of the LGPDPPSO, and the controller does not have elements to rectify it, the data owner will be notified within five days following the submission of the request to exercise the ARCO rights, for one single occasion, to rectify the omissions within a period of ten days counted from the day following the notification. After the period has elapsed without fulfilling the warning, the request to exercise the ARCO rights will be considered not to have been submitted.

The prevention will have the effect of interrupting the period that the INAI has to resolve the request to exercise ARCO rights.

When the person responsible is not competent to handle the request for the exercise of ARCO rights, he/she must inform the owner of this situation within three days following the submission of the request, and if it can be determined, direct him/her to the competent person responsible.

When the provisions applicable to certain personal data processing establish a specific process or procedure to request the exercise of ARCO rights, the controller must inform the owner of its existence, within a period of no more than five days following the submission of the request for the exercise of ARCO rights, so that the latter may decide whether to exercise his or her rights through the specific process, or through the procedure that the controller has institutionalized for handling requests for the exercise of ARCO rights in accordance with the provisions established in articles 48 to 56 of the LGPDPPSO.

In this specific case, please note that there is no specific procedure to request the exercise of ARCO rights in relation to personal data collected for the purposes reported in this privacy notice.

g) The right of the owner to file an appeal for review before the INAI if he or she is dissatisfied with the response.

The aforementioned right is established in articles 103 to 116 of the LGPDPPSO, which provide that the owner, by himself or through his representative, may file an appeal for review before the INAI or the Transparency Unit of the person responsible who has heard the request for the exercise of the ARCO rights, within a period that may not exceed fifteen days from the day following the date of notification of the response.

In the event that the owner has any questions regarding the procedure for exercising the ARCO rights, he/she may go to the IFT Transparency Unit, located at Avenida Insurgentes Sur #1143 (Headquarters Building), Ground Floor, Colonia Nochebuena,

Benito Juárez Territorial Demarcation, Postal Code 03720, Mexico City, send an email to the following address unidad.transparencia@ift.org.mx or call 55 5015 4000, extensions 4688, 2321 and 2205.

IX. Mechanisms, means and procedures to exercise the right to portability of personal data before the IFT.

The data subject or his/her legal representative may exercise the right to portability of personal data held by the IFT. In this regard, it is reported that the right to portability of personal data is a prerogative that allows the data subject to obtain a copy of the personal data that he/she has provided directly to the IFT, in a structured and commonly used format, to reuse them for his/her own purposes and in different services.

This right also implies that personal data may be transmitted to other public bodies, departments or entities (controllers), without the need to be delivered to the data subject.

The formats available to the IFT to guarantee the exercise of the right to portability of personal data are the following:

- a) Excel (*.xlsx)
- b) Text (*.txt)
- c) Text file (*.csv), and
- d) Hypertext Markup Language (*.html)

In this regard, the types or categories of personal data collected and reported in this privacy notice, which are technically portable in the formats indicated above, are the following:

- *Identification data: Full name of natural persons, where applicable, full name of legal representative.*
- *Contact information: Email address.*

The right to the portability of personal data may be exercised before the IFT, through a free written document, or through the format designed for this purpose, which is available at the following electronic link: https://www.ift.org.mx/sites/default/files/OPNT/LGPDPPSO/4_Portabilidad/Criterio_4_1_2.zip.

The request for portability of personal data may be addressed to the Transparency Unit, by email at unidad.transparencia@ift.org.mx, or delivered in person at the Transparency Unit module, located on the Ground Floor of the Headquarters Building, located at Avenida Insurgentes Sur #1143, Colonia Nochebuena, Benito Juárez Territorial Demarcation, Postal Code 03720, in Mexico City.

To learn more about how to exercise the right to portability of personal data, the IFT makes available to the public the "Guide to exercise the right to portability of personal data in possession of the Federal Telecommunications Institute", which is available at the electronic link: https://www.ift.org.mx/sites/default/files/OPNT/LGPDPPSO/4_Portabilidad/Criterio_4_1_2.zip.

X. The address of the IFT Transparency Unit.

The IFT Transparency Unit is located at Avenida Insurgentes Sur #1143 (Headquarters Building), Colonia Nochebuena, Benito Juárez Territorial Demarcation, Postal Code 03720, Mexico City, and has a customer service module on the ground floor of the building, with business hours from 9:00 a.m. to 6:30 p.m., Monday through Thursday, and Friday from 9:00 a.m. to 3:00 p.m., telephone number 55 5015 4000, extensions 4688, 2321 and 2205.

XI. The means by which the controller will communicate changes to the privacy notice to the data subjects.

Any changes to the Privacy Notice will be communicated to the holders of personal data in the section "Privacy Notices of the Federal Telecommunications Institute", of the Virtual Section for the Protection of Personal Data of the IFT, available at the electronic address: <https://www.ift.org.mx/proteccion-de-datos-personales/avisos-de-privacidad>

Last updated: (06/30/2023)

II. comments, opinions and contributions from the participant on the matter in Public Consultation

Section	Number / subsection / paragraph	Comment, opinions or contributions

Note: add as many rows as you consider necessary.

III. Comments, opinions and general contributions of the participant on the matter in Public Consultation

Dear Commissioner President,

[REDACTED] thanks the Instituto Federal de Telecomunicaciones (IFT) for providing an opportunity to comment on the IFT's Public Consultation re the 64 GHz to 71 GHz Frequency Band.

[REDACTED] is a leading consensus-based open standards development committee for networking standards that are used by industry globally. It produces standards for networking devices, including wired and wireless local area networks ("LANs" and "WLANs"), wireless specialty networks ("WSNs"), wireless metropolitan area networks ("Wireless MANs"), and wireless regional area networks ("WRANs"). Technologies produced by implementers of our standards are a critical element for all networked applications today.

[REDACTED] is a committee of the IEEE Standards Association and of Technical Activities, two of the Major Organizational Units of the IEEE. IEEE has about 400,000 members in over 160 countries and its core purpose is to foster technological innovation and excellence for the benefit of humanity. IEEE is also a major accredited standards development organization whose standards are recognized worldwide. In submitting this document, [REDACTED] acknowledges and respects that other components of IEEE Organizational Units may have perspectives that differ from, or compete with, those of [REDACTED]. Therefore, this submission should not be construed as representing the views of IEEE as a whole².

IEEE 802.11 Support for 60 GHz Band

IEEE Std 802.11-2024³ defines operation in the 57 GHz to 71 GHz band (a.k.a. the 60 GHz band) as licensed exempt spectrum. Wi-Fi Alliance started certification of Wi-Fi CERTIFIED WiGig devices in October 2016. WiGig technology is based on IEEE 802.11ad-2012 standard, supporting the operation from 57 GHz to 66 GHz that was later extended by IEEE

² This document solely represents the views of IEEE 802 LMSC and does not necessarily represent a position of either the IEEE or the IEEE Standards Association or the IEEE Technical Activities.

³ "IEEE Draft Standard for Information Technology -- Telecommunications and Information Exchange Between Systems Local and Metropolitan Area Networks -- Specific Requirements - Part 11: Wireless Local Area Network (LAN) Medium Access Control (MAC) and Physical Layer (PHY) Specifications," in IEEE P802.11-REVme/D7.0, August 2024, vol., no., pp.1-6213, 30 July 2024.

802.11ay-2021 standard to cover the entire 57 GHz to 71 GHz band. Additionally, the IEEE 802.11ay-2021 standard includes mechanisms for channel bonding and MU-MIMO technologies which results in higher transmission rates and range. Channel bonding allows up to four 2.16 GHz channels to be bonded together which would result in much higher throughput. IEEE 802.11ay supports channel bonding combined with other features such as higher number of spatial streams and higher QAM modulation provided an increase in the peak data rate from 7 Gb/s to 176 Gb/s. Figure 1 shows IEEE 802.11 channel plan from the 57 GHz to 71 GHz band.

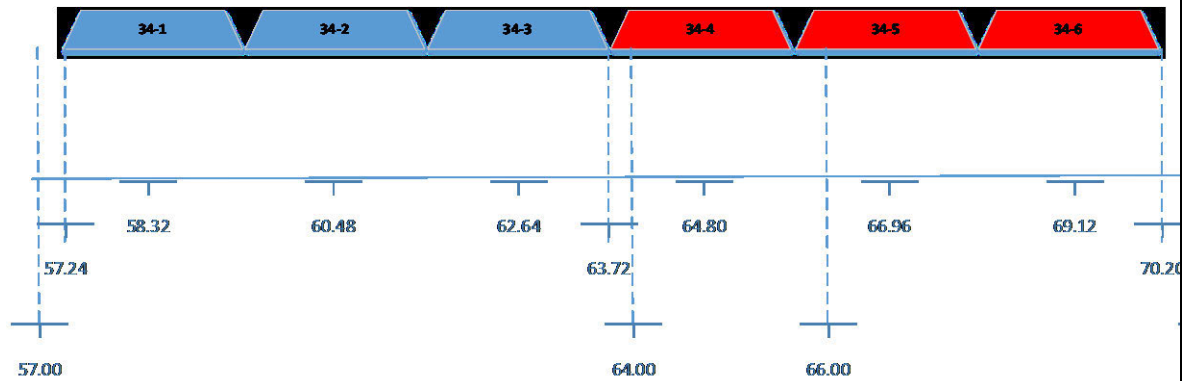


Figure 1. IEEE 802.11 channel plan from 57 GHz to 71 GHz

Authorization of the 64 GHz to 71GHz band as license exempt spectrum enables the full four channel bonding to be utilized in Mexico.

The resulting peak data rate in Wi-Fi CERTIFIED WiGig™ devices expands and enhances the Wi-Fi® experience in applications including virtual reality, multimedia streaming, gaming, wireless docking, and enterprise applications that require high speed, data-intensive connections.

Since the introduction of technology in 2016, the primary application for WiGig technology has been for wireless backhaul and connectivity in Internet Service Provider (ISP) and enterprise class backhaul deployments⁴.

To further advance use of the 60 GHz band, the IEEE 802.11 Working Group is currently working on a new standard titled "Enhancements for Integrated mmWave (IMMW) WLAN". The scope of this standard is to define one medium access control (MAC) and one physical layer (PHY) specifications for wireless connectivity for fixed, portable, and moving stations (STAs) within a local area. This standard would also offer regulatory bodies a means to standardize access to the frequency bands between 42 GHz and 71 GHz frequency range for the purpose of local area communication.

In particular, this new standard defines modifications to both the IEEE Std 802.11 PHY and MAC that allows Wireless Local Area Network (WLAN) non-standalone operation in the license-exempt bands between 42 GHz and 71 GHz using single-user (SU) OFDM based transmissions. The new standard leverages or reuses existing PHY and MAC specifications defined for operation in the 2.4 GHz to 7.25 GHz (sub-7 GHz) license-exempt bands, and requires that an IEEE 802.11 device supporting this new standards also supports at least one of the sub-7 GHz license-exempt bands. The amendment expands the multi-link operation defined in the sub-7 GHz band specifications to support non-standalone operation in the license-exempt bands between 42 GHz and 71 GHz.

Use of WLANs based on IEEE 802.11 technology continues to grow and diversify over many market segments including residential, enterprise, and industrial. More stringent requirements are emerging to meet the demands of new applications (e.g. augmented and virtual reality, proximity ranging and sensing) both in terms of throughput, latency bounds and accuracy. The very large bandwidth available in the license-exempt bands between 42 GHz and 71 GHz, combined with the widely used 2.4 GHz, 5 GHz and 6 GHz bands, offers a great opportunity to help meet these requirements even in the densest environments. Enabling non-standalone operation in the license-exempt bands between 42 GHz and 71 GHz in a cost-effective manner is required such that as many devices can benefit from it.

⁴ Some examples of the existing applications can be found at <https://wifinowglobal.com/news-blog/marine-network-services-for-ships-and-yachts-airvine-could-be-key-to-next-generation-networking/>, https://www.arubanetworks.com/assets/ds/DS_AP387.pdf, <https://www.ispsupplies.com/brands/cambium-networks/cambium-cnwave>

Another current IEEE 802.11 project is IEEE P802.11bf "Enhancements for Wireless Local Area Network (WLAN) Sensing". This standard defines modifications to the IEEE 802.11 medium access control layer (MAC) and to the Directional Multi Gigabit (DMG, i.e., IEEE 802.11ad) and enhanced DMG (EDMG, i.e. IEEE 802.11ay) PHYs to enhance Wireless Local Area Network (WLAN) sensing (SENS) operation in license-exempt frequency bands between 1 GHz and 7.125 GHz and above 45 GHz including 57 GHz to 71 GHz. This standard is intended to enhance WLAN sensing and augments PHY and MAC capabilities defined in the IEEE 802.11ax-2021 standard, IEEE 802.11ay-2021 standards, IEEE 802.11az-2022 standards, the draft IEEE P802.11be and the IEEE P802.11 revision standards.

Sensing applications are applicable to personal computers, enterprise networking devices, consumer electronic devices, home networking equipment, mobile devices, wireless sensing equipment including for behavior recognition, vehicular, smart homes, and security applications. Measurements obtained with WLAN sensing can be used to enable applications such as presence detection and gesture classification, among others.

Support for Designation of 64 GHz to 71 GHz as License-exempt Spectrum

recognizes and applauds IFT to classify the frequency band 64 GHz to 71 GHz as license-exempt spectrum. This decision would enable growing applications that rely on the mmWave spectrum based networks and would also advance frequency sharing and co-existence between various license-exempt technologies based on the family of IEEE 802 standards.

also supports IFT proposal in Annex 1 "TECHNICAL OPERATING CONDITIONS FOR THE USE OF THE FREQUENCY BAND 64-71 GHz" in alignment with other regulatory bodies.

Conclusion

[REDACTED] thanks the IFT for the opportunity to provide this submission and supports the IFT proposal to classify the frequency band 64 GHz to 71 GHz as license-exempt spectrum.

Respectfully submitted,

By: /ss/.

[REDACTED]
[REDACTED]

Note: add as many rows as you consider necessary.