

Joint BREKO, BDEW and VKU Position on RSPG's Draft Opinion on Long-term vision for the upper 6 GHz band

BREKO, BDEW and VKU **welcome the efforts of the Radio Spectrum Policy Group (RSPG)** – a high-level advisory group that assists the European Commission – to analyse the question of the future allocation of the upper 6 gigahertz (GHz) band from different perspectives and appreciate the opportunity to comment on the Draft Opinion on Long-term vision for the upper 6 GHz band of 17 June 2025.

Even though **RSPG utters a slight preference for a band split option**, allocating 160 MHz to WiFi, we see an urgent need to express the importance of the upper 6 GHz band especially for households, schools, universities, companies, authorities relying on fixed networks – especially, regarding the fact that even an option only providing for 0 megahertz (MHz) for Wi-Fi is considered in the paper.

The over 2400 companies organized in BREKO, BDEW and VKU are investing several billion euros annually to provide those mentioned households and facilities with gigabit speeds and thereby create a basis for Germany's digitalization. Therefore, we call on the RSPG and the European Commission to take spectrum needs seriously and to allocate not only a part of but the **entire** upper 6 GHz band (6425–7125 MHz) for licence-exempt use to enable advanced futureproof wireless technologies such as Wi-Fi 6E and Wi-Fi 7.

This step is **essential** to meeting the goals of the EU Digital Decade, which not only require full network coverage but also high network performance. Fibre networks offer reliable high speed and low latency, but their benefits can only be fully realized if the fibre networks are paired with equally powerful in-home Wi-Fi. Without reliable and fast wireless connectivity, end-users cannot take full advantage of what fibre broadband offers as well as **present and future customers' needs** are expecting.

A **critical technical requirement** for unleashing the capabilities of Wi-Fi 7 is the availability of at least one but ideally multiple, continuous 320 MHz channels. Only the full 1200 MHz of the 6 GHz band (5925–7125 MHz) provides sufficient spectrum to enable such wide, non-overlapping channels. These are key to achieving the multi-gigabit speeds, low latency, and high efficiency that Wi-Fi 7 promises.

Looking ahead, studies show that to ensure full building coverage and enterprise-grade performance in dense urban areas, even more spectrum will be needed – namely, at least ten 160 MHz channels, which would require 1600 MHz. This shows that WiFi not only needs the entire upper 6 GHz band. Furthermore, it seems sensible to secure the

1200 MHz band now in order to meet both current and future needs.¹ Fragmenting the band or limiting access would constrain the performance of next-generation Wi-Fi networks and diminish the value delivered by high-capacity fibre deployments. Instead, **the present and the future must move in the same direction**. This need becomes even more pressing in light of current **data usage trends**. In 2023, 98 percent of data traffic in Germany was transmitted over fixed broadband networks². Moreover, data consumption is increasing by an average of 21 percent per year³. These figures highlight the growing reliance on fixed networks and the increasing demand for high-performance Wi-Fi as a critical enabler of digital services and applications in households and businesses alike.

Alternative network operators, who are responsible for more than 60 percent of the FTTH deployment in Germany, rely on strong in-home wireless performance to deliver competitive services and meet customer expectations. Ensuring broad unlicensed access to the upper 6 GHz band would support **infrastructure-based competition**, enable **cost-effective innovation**, and provide wide access to **next-generation connectivity** without adding regulatory or financial burdens.

BREKO, BDEW and VKU oppose the introduction of licensed mobile (IMT) services in the upper 6 GHz band. There is currently no proven demand for additional licensed spectrum in this range. **Granting exclusive access to mobile operators would risk reinforcing existing market dominance and would limit spectrum access for broader societal use**. Such a step would reduce flexibility, hinder competition, and ultimately significantly delay progress toward a fibre-based digital economy needed to strengthen EU's global competitiveness. Mobile operators already have access to ample alternative spectrum, including mid- and high-band frequencies suitable for 5G and future 6G deployments. **Studies show that current mobile spectrum is underutilized**, and additional capacity can be met without encroaching on the upper 6 GHz band.⁴

Allowing mobile operators to use the upper 6 GHz band would distort competition, particularly disadvantaging **fibre-only providers**. These providers depend on

¹ [WiFi Spectrum Requirements, Plum Consulting](#), 18th March 2024, p. 4 : „Europe’s current five 160 MHz channels can only support gigabit coverage to approximately 50-60% of residential building area. To ensure whole-building coverage, a minimum of ten channels is necessary. Therefore, Wi-Fi access to the 6.425-7.125 GHz is imperative to support current and future generations of Wi-Fi in Europe.“; [A Quantification of 5 GHz Unlicensed Band Spectrum Needs](#)”, [Qualcomm Technologies](#), Inc (2016, revised 2023)

² [Bundesnetzagentur, Annual Report: Telecommunications and Broadband Market Data 2023](#)

³ [FTTH Council Europe, Market Panorama 2024](#)

⁴ [Aetha \(2023\), The frequency situation in Germany ahead of the upcoming frequency allocation 2024/2025](#).

interference-free Wi-Fi to deliver high-quality services. In contrast, mobile operators active in both fixed and mobile markets could gain a structural anti-competitive advantage. Reserving the band for Wi-Fi ensures a level playing field and supports a diverse and competitive broadband market.

Further, **several leading digital economies - including the USA, Japan, South Korea, and Canada - have already allocated the entire 6 GHz band for licence-exempt use.** These decisions were driven by the need to support innovative applications such as augmented reality, video conferencing, and high-density wireless environments. The EU risks falling behind in global digital competitiveness and sovereignty if it does not follow suit.

Moreover, while BREKO, BDEW, and VKU endorse the objective of **efficient spectrum allocation**, we must acknowledge that **spectrum hoarding presents a significant obstacle** to achieving this goal. This also ties in with the studies mentioned that current mobile spectrum is underutilized. In Germany, for instance, the "use it or lose it"-principle is established by national legislation, allowing for the removal of unused frequencies. However, mobile operators continue to hoard valuable spectrum designated for Wi-Fi, which they no longer require due to the slowdown in mobile traffic growth. This practice restricts access to the spectrum for specific uses by others, particularly concerning the 6 GHz band, which is essential for indoor data transmission.

In addition, Wi-Fi offers **significant energy efficiency** and **sustainability benefits** compared to mobile networks. Encouraging Wi-Fi use through unlicensed spectrum access supports the EU's climate and environmental goals by reducing the energy footprint of digital infrastructure.

We therefore urge the European Commission to take a clear and forward-looking decision by designating the entire upper 6 GHz band for licence-exempt use, in order to safeguard Europe's digital competitiveness in challenging times, maximise the benefits of fibre infrastructure, and particularly ensure that citizens and businesses have access to fast, reliable, and future-ready wireless connectivity.



About the signatories:

BREKO (Bundesverband Breitbandkommunikation e.V.) represents over 500 companies, including 260+ network operators which are responsible for more than 60% of fibre coverage in Germany.

BDEW (Bundesverband der Energie- und Wasserwirtschaft e.V.) represents over 2,000 energy and water suppliers of all sizes. These companies have played a key role in the expansion of fiber optic infrastructure for many years, as they invest in and operate networks across the country, including through subsidiaries and sister companies.

VKU (Verband kommunaler Unternehmen e.V.) represents 1601 municipal utilities and public enterprises, many of which are investing in and operating fibre networks to strengthen regional digital infrastructure.