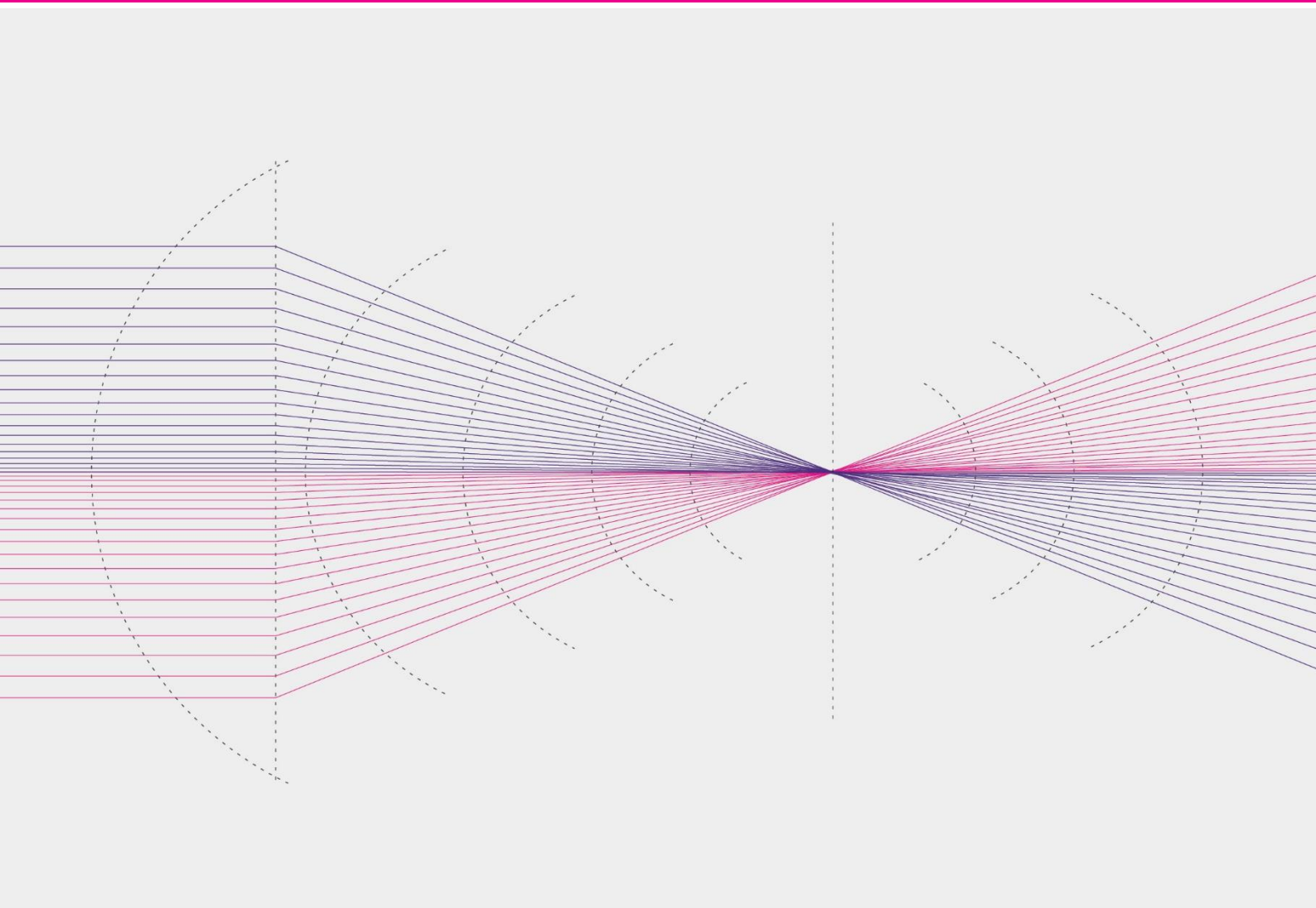




Wi-Fi® Spectrum Requirements in China

6 September 2024

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About Plum

Plum offers strategy, policy and regulatory advice on telecoms, spectrum, online and audio-visual media issues. We draw on economics and engineering, our knowledge of the sector and our clients' understanding and perspective to shape and respond to convergence.



About this study

In China, as elsewhere, significant resources are being committed to upgrade the connectivity infrastructure. With Wi-Fi® becoming the primary means by which people and devices connect to the Internet, the overall connectivity benefits depend on Wi-Fi performance. As with any wireless technology, inadequate spectrum capacity degrades Wi-Fi performance. This study for the Wi-Fi Alliance uses engineering models to analyse spectrum requirements in China for Wi-Fi technology in a residential scenario.

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Summary

Wi-Fi plays a crucial role in the distribution of fixed broadband connectivity in homes, offices, and various other environments. The vast majority (up to 92%) of home internet traffic is connected to the end-user through Wi-Fi. In enterprise settings, Wi-Fi is essential for handling the large amounts of data and simultaneously connecting large number devices with improved reliability, higher data throughput and lower latencies. Governments across the world are prioritising deployment of very high-capacity fixed network infrastructure – but connectivity is only as good as the narrowest bottleneck. In short, Wi-Fi functionality is integral to the modern connected lifestyle in homes, businesses, and public spaces.

As more people and more devices connect through Wi-Fi networks, the demand for spectrum bandwidth increases significantly. Proliferation of high-bandwidth applications, such as high-definition video streaming, automation, gaming, remote work and learning, augmented and virtual reality, and distributed computing are straining the available Wi-Fi spectrum capacity even further. The latest generations of Wi-Fi offer design features that significantly improve Wi-Fi spectral efficiency, particularly in environments with high user and device densities, but these technological improvements are not enough to overcome bandwidth constraints¹.

Adequate spectrum capacity (bandwidth) is imperative to Wi-Fi performance, ensuring that it does not become a bottleneck that constrains the end-to-end connectivity. The focus of this study is to simulate and analyse the impact of spectrum availability on Wi-Fi ability to support broadband connectivity in the Chinese residential deployments. In some countries up to ten 160 MHz channels² (three at 5 GHz, seven at 6 GHz)³ are available, while only three 80 MHz Wi-Fi channels (at 5 GHz) are available in China..

The simulations presented here model high-density Wi-Fi deployment in a typical residential apartment building with fibre connectivity to every apartment. The model is used to quantify the extent to which Wi-Fi spectrum congestion sets a constraint (i.e., bottleneck) on the connectivity provided by fibre. The model is based on the deployment pattern set out by the IEEE⁴ for use in simulations.

Insufficient spectrum access (i.e., bandwidth) degrades Wi-Fi performance and, ultimately, undermines the investment made in underlying infrastructure deployments (e.g., fibre). The results of this study confirm that the limited Wi-Fi spectrum bandwidth is very likely to impose a bottleneck on residential broadband connectivity. With access to only three 80 MHz channels, Wi-Fi can support 500 Mbit/s connectivity in around 30% of residential building area and only in 3% at gigabit speeds. To ensure whole-building coverage at 500 Mbit/s, a minimum of ten 80 MHz channels are needed with Wi-Fi access to some spectrum in the 6 GHz band.

¹ *Orthogonal Frequency Division Multiple Access* allows multiple devices to communicate simultaneously within a single Wi-Fi channel by dividing it into smaller sub-channels called resource units (RUs). *Basic Service Set Colouring* helps mitigate interference between neighbouring Wi-Fi networks operating on the same channel. *4096-QAM* increases the data transmission rate by encoding more bits per symbol compared to previous Wi-Fi standards. *Multi-Link Operation* enables the simultaneous use of multiple Wi-Fi channels for data transmission. *Target Wake Time* allows devices to schedule when they wake-up to communicate with the router, reducing unnecessary wait time and conserving power

² In practical deployments, smaller channel widths will generally be selected at 5 GHz to give better re-use and accommodate legacy devices

³ Wi-Fi access to the 5 GHz channels is constrained by the Dynamic Frequency Selection (DFS) requirements. The DFS implementation complexities further reduce 5 GHz utilization, driving data traffic to other (unconstrained) channels.

⁴ IEEE P802.11 Wireless LANs - TGax Simulation Scenarios. IEEE 802.11-14/0980r16. IEEE, July 2015

1 Introduction and background

Wireless has become the default way in which people and devices connect to the internet, and these connections are dominated by Wi-Fi. In Europe, for example, 98% of home internet access is provided by fixed technologies (fibre and cable) and 92% of that traffic is then relayed by Wi-Fi to end users.⁵ Not only is Wi-Fi used to connect devices to the internet, but it is also employed to connect devices, and the people that use them, to each other. The applications for these devices are expanding rapidly to smart cities and public venues such as educational institutions, stadiums, health care facilities (to connect critical care monitors and similar devices) as well as in the enterprise settings such as offices or manufacturing facilities (e.g., for industrial automation) and, of course, in homes to support a variety of high data throughput use cases.

Wi-Fi technology has evolved continually over more than two decades, using spectrum sensing and polite protocols to minimize interference to other services and leveraging techniques such as MIMO, larger channel bandwidths and frequency “colouring” to maximize spectrum efficiency. Over time, the spectrum addressed within the 802.11 series of Wi-Fi specifications expanded from the 80 megahertz (MHz) in the 2.4 gigahertz (GHz) spectrum, to the addition of 560 MHz in the 5 GHz range and then further to the new spectrum in 6 GHz. In the USA, Wi-Fi can access 1200 MHz of 6 GHz spectrum, but elsewhere access to this spectrum is more limited (In Europe⁶, only 500 MHz is available, in China none is).

Despite this evolution, it is increasingly the case that Wi-Fi quality of service is being constrained by spectrum congestion. That congestion is being caused not only by the volume of Wi-Fi devices being used through the expanded use of Wi-Fi to connect people and things, but also the type of Wi-Fi applications. New uses such as augmented and virtual reality (AR/VR) devices require greater bandwidths and lower latency, which both require additional spectrum access.

In 2016 a study by Qualcomm [2] concluded that regulators should plan to ensure that approximately 1,280 MHz of spectrum is available for Wi-Fi at “around 5 GHz.” The study was updated in 2023, showing that the use cases modelled (Enterprise and Dense Residential) required a total of between 600 MHz and 2,400 MHz of spectrum.

A different technical modelling exercise (the “Wi-Fi Spectrum Needs Study”) by Quotient Associates in 2017 [4] determined that a total of 1,120 MHz (or 1,920 MHz, taking a pessimistic “upper bound”) would need to be available at 5/6 GHz by 2025, with the residential case being the most challenging. At the time, only 455 MHz of 5 GHz spectrum was available, giving a potential shortfall of 665 MHz (or 1,465 MHz for the ‘upper bound’)⁷.

Since the Quotient study, a substantial additional resource at 6 GHz⁸ has been made available for Wi-Fi use in some countries, but elsewhere access to this spectrum is limited. Importantly, present and future generations of Wi-Fi are engineered for optimal performance in the 6 GHz band – there is no alternative spectrum.⁹

1.1 The latest Wi-Fi technologies improve spectrum efficiency

Since its first widespread adoption around the time of the Millennium, the “headline” bit rates available to Wi-Fi users have increased by three orders of magnitude. Over the same timescale, however, the data rates demanded by user applications have increased while the tolerance of latency has decreased for many applications. Furthermore, the sheer popularity of Wi-Fi has led to a much higher device density and a

⁵ Digital Economy and Society Index (DESI) 2022 | Shaping Europe’s digital future (europa.eu)

⁶ See <https://www.wi-fi.org/countries-enabling-wi-fi-6e>

⁷ These figures assume the use of spectrum constrained by the Dynamic Frequency Selection (DFS) requirement. The values are higher if this is not available.

⁸ In two CEPT administrations, a further 125 MHz in the sub-band at 5725–5850 MHz has also been authorised for use.

⁹ See Wi-Fi Certified 7™ available at <https://www.wi-fi.org/news-events/newsroom/wi-fi-alliance-introduces-wi-fi-certified-7>

consequent increase in mutual interference. According to a report¹⁰ by IDC Research, there were 19.5 billion Wi-Fi devices in use in 2023.

Although the headline physical layer data rate in Wi-Fi 6 increases from 7 Gbit/s to 10 Gbit/s, such figures are increasing irrelevant in a spectrum contended environment. More significant in terms of practical user experience will be the adoption of OFDMA¹¹, which can greatly improve the throughput efficiency of real data over a given physical channel data rate.

Wi-Fi 6 also improves spectrum utilization through the use of BSS colouring¹², in which traffic within a particular network carries an identifying flag, or “colour.” This can be used to allow other networks to determine patterns of frequency, spatial, and temporal occupancy in their neighbourhood, and to optimize scheduling to minimize interference.

The new Wi-Fi 7 standard, with certification through Wi-Fi Alliance starting in January 2024, doubles the maximum channel width from the 160 MHz of Wi-Fi 5 and Wi-Fi 6 to 320 MHz. In addition, the highest-order modulation increases from 1024-QAM to 4096-QAM (although there will be statistically few links with the signal-to-noise ratio required to exploit this). Multi-Link Operation (MLO) allows traffic to be aggregated across links established simultaneously on multiple bands. When applied to mesh networks, it can allow both backhaul and user traffic to be switched seamlessly between bands in response to interference or other link degradation.

Despite these substantial improvements in spectrum efficiency, the popularity and ubiquitous deployment of Wi-Fi networks means that in many cases, performance is limited by mutual interference, due to lack of spectrum resource.

A summary table of Wi-Fi technical characteristics across the generations is provided in Appendix B.

1.2 Current and prospective spectrum availability

1.2.1 History of Wi-Fi spectrum access

The history of spectrum availability is complicated and subject to considerable regional variations, which have created significant problems for manufacturers and users. The initial allocation in the Industrial, Scientific and Medical’ (ISM) spectrum at 2.4 GHz accommodates four non-overlapping 20 MHz channels.

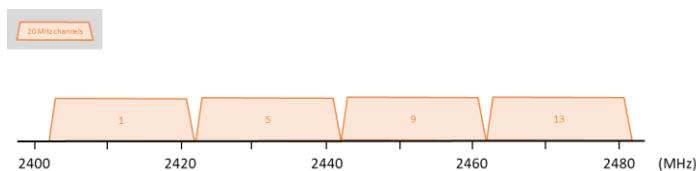


Figure 1.1: Spectrum at 2.4 GHz available for Wi-Fi access¹³

The spectrum at 2.4 GHz, is increasingly congested with considerable use by Bluetooth and other Short Range Devices including remote controlled toys, garage door openers, cordless telephones, etc. Furthermore, the

¹⁰ IDC Worldwide Wi-Fi Technology Forecast, 2023-2027, March 2023

¹¹ Orthogonal Frequency-Division Multiple Access

¹² In Wi-Fi parlance, a ‘Basic Service Set’ defines a network of user devices connected to an Access Point.

¹³ Other unlicensed technologies (e.g., Bluetooth) use portions of the 2.4 GHz band which further limits Wi-Fi spectrum access

overall bandwidth is very limited. As a result this spectrum is generally unsuitable for supporting reliable broadband connectivity and is not considered in the present modelling.

With the introduction of 802.11a in 1999, a further 200 MHz of spectrum became available at the lower end of the 5 GHz band (5150-5350 MHz) and this expanded over time, in several countries. Use of the upper parts of the band are constrained by the need to protect radar and other systems, and there is a complicated pattern of regional power restrictions and mandatory requirements to implement Dynamic Frequency Selection (DFS) based on the detection of local radar emissions.¹⁴

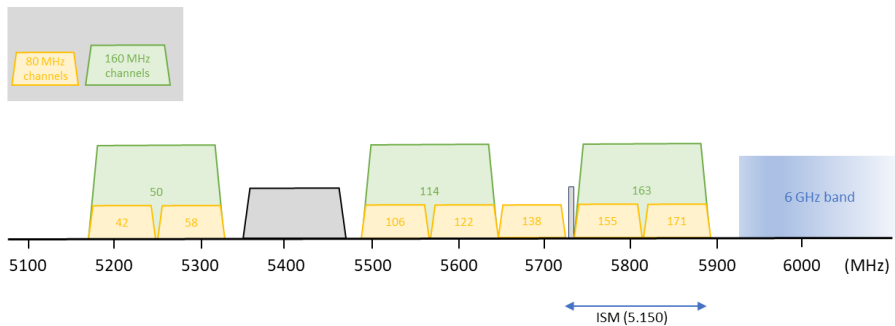


Figure 1.2: Spectrum at 5 GHz available for Wi-Fi (US)

The situation in China is significantly constrained in comparison to the US; the only spectrum available beyond the original 200 MHz lies within the ISM spectrum¹⁵ at 5735-5835 MHz, as indicated in Figure 1.3.

Relevant technical constraints for wireless broadband systems are set out in [7]. The 5.1 GHz band can be used for indoor wireless broadband systems which must employ TPC/DFS, while the 5.8 GHz band can be used for wireless broadband, point-point links and road-tolling. The document notes that both bands shall comply with “one of the technical requirements for interference avoidance listed in Annex 2”, effectively the use of ‘listen-before-transmit’ and limited duty-cycles.

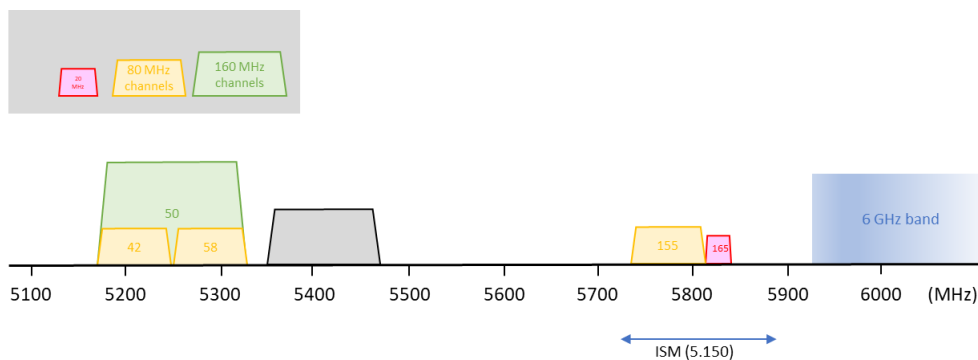


Figure 1.3: Spectrum at 5 GHz available for Wi-Fi (China)

With the release of 802.11ax (Wi-Fi 6), the ability to use spectrum at 6 GHz was added to the standard (for the subset of devices branded as Wi-Fi 6E¹⁶), enabling access to a further seven x 160 MHz channels. In some

¹⁴ See for example “DFS channels and why to avoid them” available at <https://wifinc.net/dfs-channels-and-why-to-avoid-them-even-though-you-say-you-cannot/>

¹⁵ Designated for ‘Industrial Scientific and Medical’ use under footnote 5.150 of the ITU Radio Regulations.

¹⁶ See “Wi-Fi Alliance brings Wi-Fi 6 into 6 GHz” available at <https://www.wi-fi.org/news-events/newsroom/wi-fi-alliance-brings-wi-fi-6-into-6-ghz>

countries, all 6 GHz channels are available for indoor use with EIRP up to 30dBm (“Low-power Indoor”, or LPI) while some channels may also be used outdoors with up to 36dBm power.¹⁷

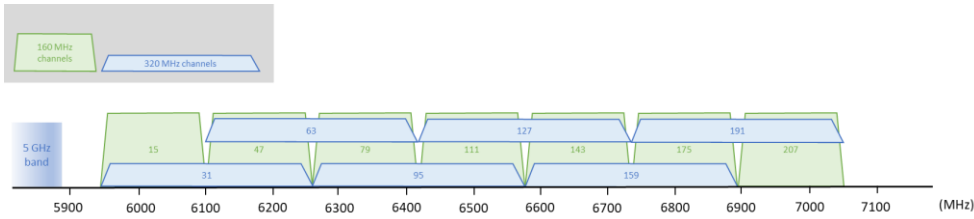


Figure 1.4: Spectrum at 6 GHz available for Wi-Fi (US)

In China, however, current regulations preclude Wi-Fi access to the 6 GHz spectrum. In total, therefore, there is only a single 160 MHz channel (plus one 80 MHz and one 20 MHz channel) currently available for use by Wi-Fi in China.

1.2.2 Regulatory Issues

At WRC-23, the 7025-7125 MHz frequency band was identified for IMT in Region 3, but with a footnote (5.457E) stating that “The identification does not preclude any application of the services to which they are allocated and does not establish priority in the Radio Regulations. [...] The frequency bands are also used for the implementation of wireless access systems (WAS), including radio local area networks (RLANs).”

¹⁷ Argentina, Brazil, Canada, Costa Rica, Saudi Arabia, South Korea, US are some of the countries that allowed Wi-Fi operations in 5.925-7.125 GHz, for details see “Regulations Enabling 6 GHz Wi-Fi” available at <https://www.wi-fi.org/regulations-enabling-6-ghz-wi-fi>

2 Modelling Approach

The simulator is implemented in the C++ language as a Monte Carlo model.

The simulation is limited to the physical layer and focusses on establishing carrier to noise and interference ratios ($C/(N+I)$) values at each device at each timestep. These values then determine the instantaneous MCS¹⁸ and hence traffic capacity for that link.

2.1 Model scenario

The model represents the high-density Wi-Fi use case of a domestic apartment building. It is assumed that gigabit fibre connectivity is provided to every apartment, and that there is a requirement to ensure that Wi-Fi spectrum congestion does not impose a bottleneck on the availability of this bandwidth. The less demanding case of connectivity with a speed to 500 Mbit/s is also considered.

The model is based on the deployment pattern set out by the IEEE¹⁹ for use in simulations. The IEEE scenario assumes a building with a 100m x 20m footprint, with five floors. There are twenty 10x10m apartments on each floor. We have followed the Qualcomm modification, assuming a residential building of half the length (50m x 20m) with only three floors and ten apartments on each floor. The model accounts for radio signal propagation through concrete and steel materials which are prevalent in construction of China's residential buildings.

We assume that each apartment is served by a single AP with a gigabit (or 500 Mbit/s) fibre connection.

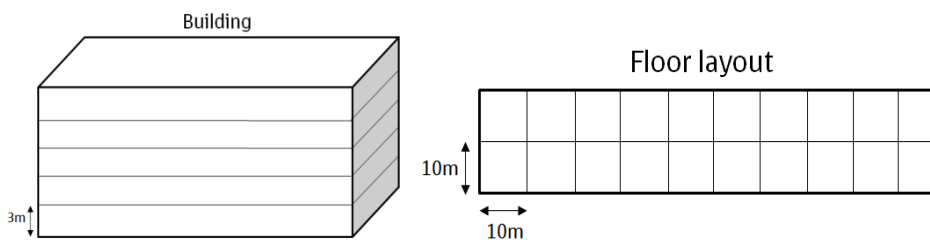


Figure 2.1: IEEE 'Dense Residential' scenario (modified in this study)

2.2 Model framework and methodology

The model consists of a semi-deterministic time-series simulator, in which access points can be deployed within a building and user terminals connect to them. The users move randomly within each room.

For each receiver, at each timestep, the received power at each user terminal is calculated from both the wanted AP and from all other AP transmitters in the simulation. This calculation accounts for propagation (the path between terminals is ray-traced, and intersections with walls, ceilings, etc. accounted for). A full-buffer traffic model is assumed.

¹⁸ Modulation & Coding Scheme

¹⁹ IEEE P802.11 Wireless LANs - TGax Simulation Scenarios. IEEE 802.11-14/0980r16. IEEE, July 2015

In this simulation framework, the user terminals serve only as a tool for sampling the potential link quality as they move in the environment, gathering statistics as the simulation progresses. The actual deployment density of user terminals is irrelevant so long as the simulation run time allows the statistical output to converge.

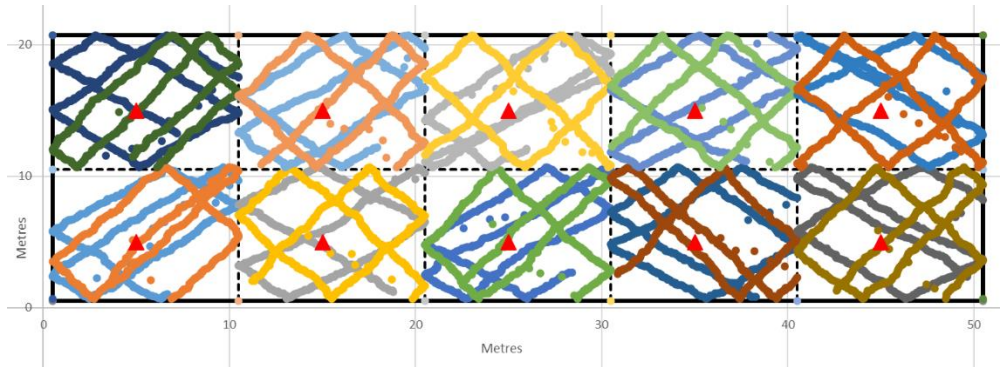


Figure 2.2: Simulation geometry: 'Dense Residential', showing single floor

At each timestep of the model, and for each AP-user link, the instantaneous $C/(N+I)$ is then determined (Figure 2.3) and this is used to determine the highest MCS available for the link. The throughput for each link is then determined on this basis.

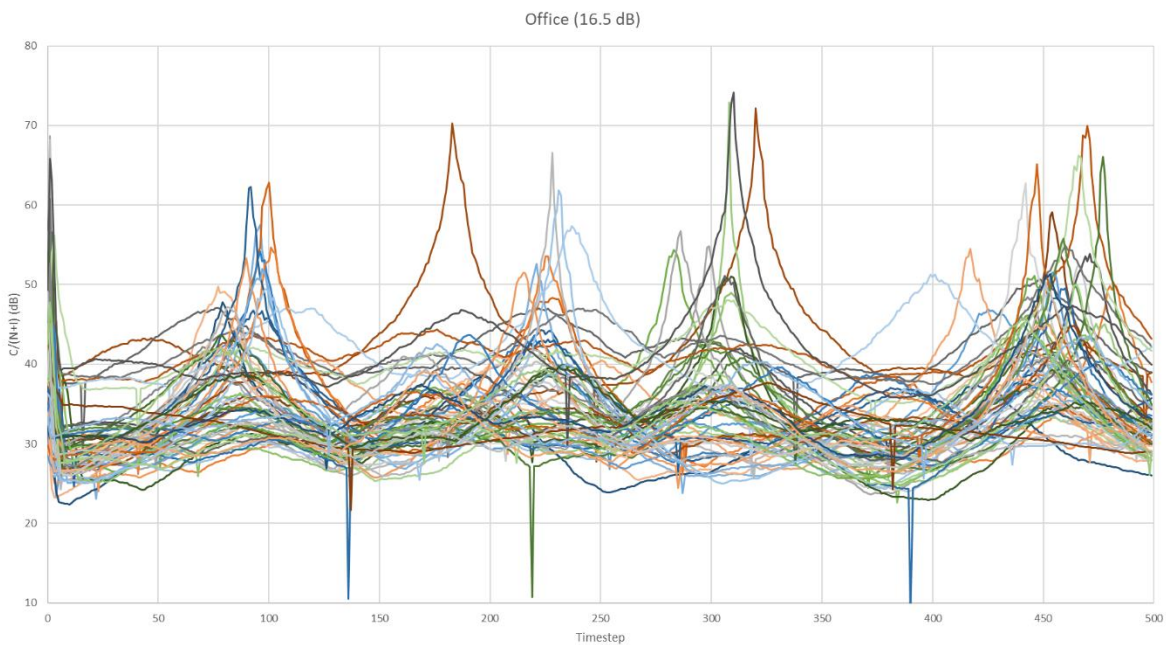


Figure 2.3: Evolution of $C/(N+I)$ values for all terminals in a simulation

At the end of each simulation, a cumulative distribution of the downlink throughput for all links in the simulation is generated, allowing the location probability of any throughput value to be determined.

2.3 PHY parameters

The following parameters are assumed in the simulation.

Table 2.1: Simulation parameters

Parameter	Value
Environment	Residential apartment block
Building dimensions	50m x 20m footprint, 3 floors
Building interior	10 apartments/floor, each 10m x 10m
Wi-Fi topology	1 AP/apartment, gigabit-fibre fed
Required aggregate downlink throughput per AP	500 Mbit/s or 1 Gbit/s
Spectrum considered	5150-7125 MHz
Wi-Fi channel bandwidth	80 MHz
AP transmit EIRP	23 dBm
Antenna pattern	Isotropic
Receiver (user terminal) noise figure	10 dB
MIMO spatial streams	2
RX sensitivity (per MCS)	Table 27-58 of 802.11ax specification
C/(N+I) requirement (per MCS)	Derived from sensitivity and noise figure
Propagation Model	P.1238
Floor/ceiling loss	18.0 dB
Wall loss	13.5 dB

Two MIMO spatial streams are assumed, as the majority of user devices only include two antennas.

2.4 Spectrum channel configurations studied

For the scenario under consideration, where domestic users require maximum throughput, the use of 160 megahertz or wider channels would be preferred to optimize network efficiencies.

Given the very constrained spectrum available in China, however, it is suggested that it is unlikely that 160 MHz channels will be generally deployed in the 5 GHz band, due to the need to maximize frequency reuse options, and to accommodate legacy equipment. We have therefore considered scenarios where 80 MHz channels are used.

The cases examined (all with 80 MHz bandwidth) are:

- 3 channels, all at 5 GHz (Current Chinese scenario)
- 21 channels, seven at 5 GHz, fourteen at 6 GHz (current US scenario)
- 9 channels (current channels plus lower six 6 GHz channels)
- 10 channels (as above, plus one additional 5 GHz channel)

3 Results

The following patterns of frequency assignments are assumed in the modelling.

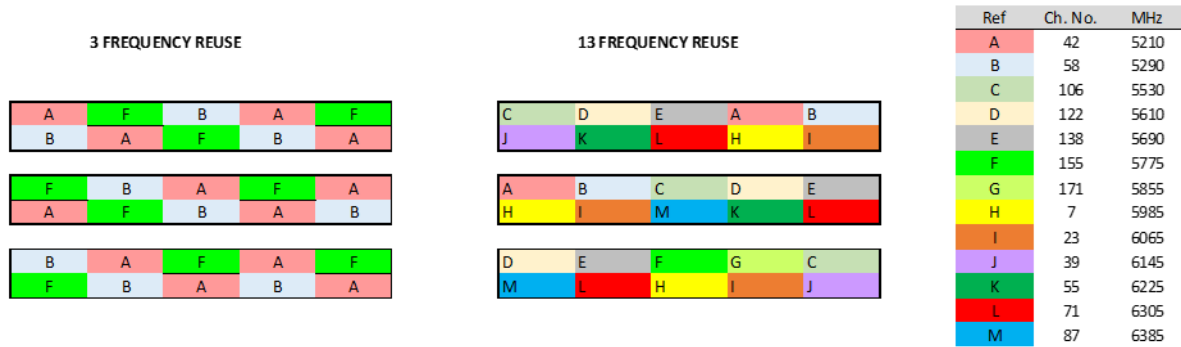


Figure 3.1: Assumed frequency-reuse pattern for current Chinese and US spectrum availability

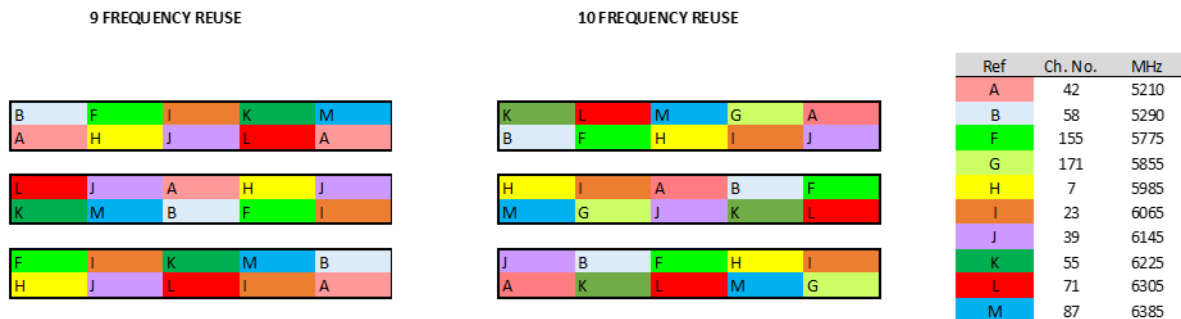


Figure 3.2: Assumed frequency-reuse for hypothetical Chinese spectrum availability

The cumulative distribution functions (CDF) below show the impact of the different frequency reuse options on the area of the building at which different throughput rates can be sustained, assuming a single fibre-connected AP in each apartment. The throughput values in the plot are those for individual links, with statistics aggregated across the whole scenario.

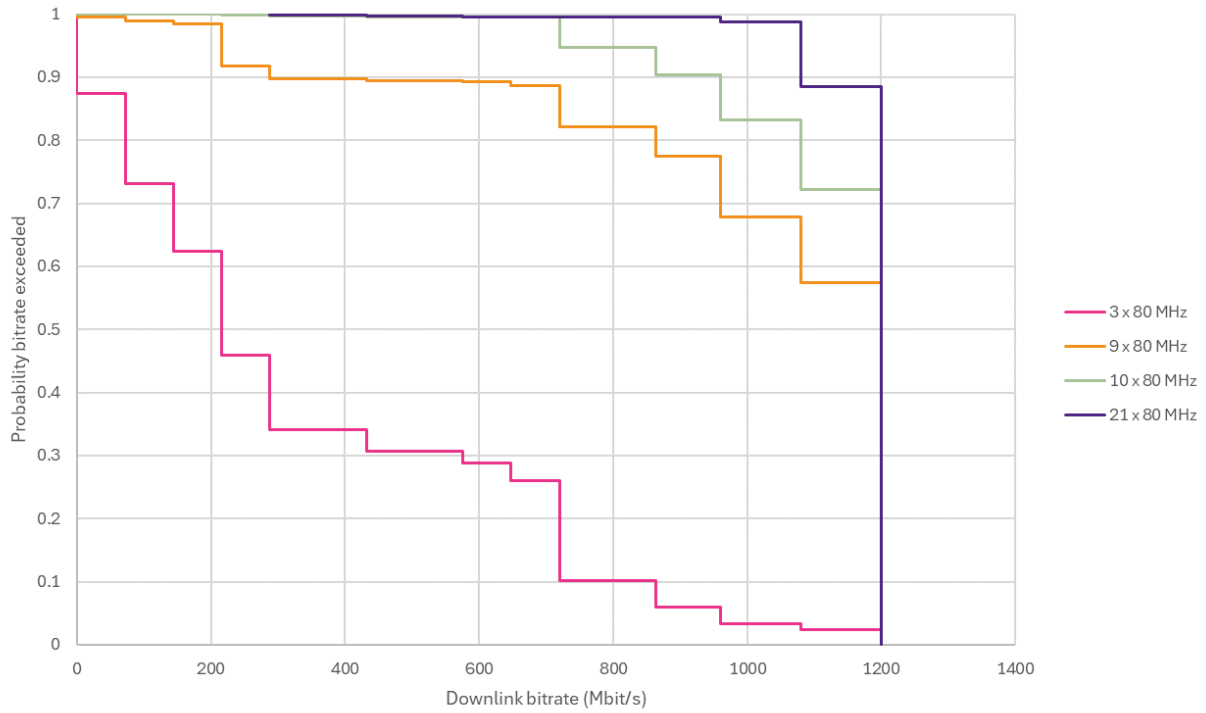


Figure 3.3: Throughput statistics for a ‘Dense Residential’ scenario with 80 MHz channels

In the present situation, where only three 80 MHz channels are available, it is clear that Wi-Fi coverage in a dense residential scenario will be significantly constrained by co-channel interference between nearby access points. The target throughput of 500 Mbit/s is achieved in only 31% percent of the apartment area, while only 3% of the area allows a gigabit connection speed.

The situation is transformed if the additional use of the six lower channels in the 6 GHz band is permitted, with 500 Mbit/s and gigabit coverage now available in 89% and 68% of the apartment area. An additional channel at 5 GHz would permit full area coverage at 500 Mbit/s (and 83% at gigabit speed).

4 Conclusion

The simulations described above provide a quantitative illustration of the relationship between spectrum availability and Wi-Fi performance in residential deployments.

In China, only three 80 MHz channels (all in 5 GHz frequency band) are available for Wi-Fi services. The results described above indicate that, for the dense use case examined, this is only sufficient bandwidth to support connectivity at 500 Mbit/s in around 30% of residential building area and only 3% at gigabit speeds. To ensure whole-building coverage at 500 Mbit/s, a minimum of ten 80 MHz channels would be necessary, some spectrum in the 6 GHz band would need to be made available for indoor wireless broadband connectivity in China. In the longer term, a minimum of ten 160 MHz channels in mid-band spectrum will be needed for optimal gigabit Wi-Fi connectivity in China.²⁰

Although this study did not analyse Wi-Fi performance in enterprise settings, it will be the case that the low number of non-overlapping channels greatly restricts the opportunities for high-density enterprise Wi-Fi deployment in China.

²⁰ See Wi-Fi Spectrum Requirements, March 2024, Plum Consulting available at <https://plumconsulting.co.uk/wi-fi-spectrum-requirements/#>

Appendix A References

- [1] Brian Williamson, Thomas Punton, Paul Hansell, *"Future proofing Wi-Fi – the case for more spectrum"*, Plum Consulting report for Cisco, 2013.
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- [7] MIIT, *"Notice of the Ministry of Industry and Information Technology on strengthening and standardizing radio management in the 2400MHz, 5100MHz and 5800MHz frequency bands"*, September 2021. ([link](#))

Appendix B Wi-Fi standards

Table B.1: Outline of Wi-Fi technical characteristics

Date	Standard	Branding	Technology	Highest modulation order	MIMO		Maximum bandwidth	Spectrum (GHz band)			Max speed Raw PHY (typ user)
					Type ¹	Streams		2.4	5	6	
1997	802.11	-	FH	GFSK	-	-	1 MHz	✓			2 Mbit/s
1999	802.11b	(Wi-Fi 1)	DSSS	QPSK	-	-		✓			11 Mbit/s
1999	802.11a	(Wi-Fi 2)	OFDM	64QAM	-	-	20 MHz		✓		54 Mbit/s (~25 Mbit/s)
2003	802.11g	(Wi-Fi 3)	OFDM	64QAM	-	-	20 MHz	✓			54 Mbit/s
2008	802.11n	(Wi-Fi 4)	OFDM	64QAM	SU	4	40 MHz	✓	✓		600 Mbit/s
2014	802.11ac	(Wi-Fi 5)	OFDM	256QAM	MU(d)	8	160 MHz		✓		6.9 Gbit/s
2019	802.11ax	Wi-Fi 6/6E	OFDM OFDMA ²¹	1024QAM	MU(du)	8	160 MHz	✓	✓	'6E'	9.6 Gbit/s (~1 Gbit/s)
2024	802.11be	Wi-Fi 7	OFDMA	4096QAM	MU(du)	8	320 MHz	✓	✓	✓	46 Gbit/s

Note 1: SU = Single-user MIMO, MU = multi-user MIMO, d = downlink only, du = bidirectional

In OFDMA, Resource Units (RU) may be of different sizes, from 26 subcarriers upwards (to 996). With a minimum subcarrier spacing of 78.125 kHz, this gives a minimum RU bandwidth of 2.031 MHz, of which 74 can be accommodated in a 160 MHz channel. This flexibility leads to significant improvements to data throughput in real-world mixed traffic environments.

BSS colouring: Prior to 802.11ax, Wi-Fi devices implemented a carrier-sense multiple access (CSMA) strategy. When a signal is detected, a device will wait for a random period before retrying, reducing throughput in a busy environment. With BSS colouring each AP (or network, or Basic Service Set, in Wi-Fi terminology) is assigned an identifier of 'colour'. These are used to determine whether it is acceptable for a device to transmit on an occupied channel or not (based on a negotiated understanding of relative signal strengths and overlapping coverage areas).

²¹ With spatial re-use

Appendix C Previous studies

The extent to which Wi-Fi capacity is constrained by spectrum availability has been considered in a number of previous reports, briefly reviewed below.

C.1 “Future proofing Wi-Fi – the case for more spectrum”, Plum for Cisco (2013)

The context for this 2013 report [1], produced for Cisco was the imminent release of the Wi-Fi 5 standard (802.11ac) and the need to accommodate 160 MHz channels.

At the time of the report, only 455 MHz of spectrum at 5 GHz was available to Wi-Fi and the report found that this was insufficient to support offered traffic in four scenarios in the near future. The Plum report assumes that an extra 320 MHz could be made available in Europe at 5350-5470 MHz and 5725-5925 MHz, and that this would allow Wi-Fi systems to accommodate the expected growth in offered data in a timeframe extending to 2024.

The most severe bottleneck was in the “transport hub” where demand would exceed existing Wi-Fi capacity in 2016. This point would be reached in 2021 for “office” and “apartment block” scenarios and in 2022 for “terraced housing.”

The modelling took into account the increasing market penetration of devices that can exploit wider channels, the 5 GHz band and MIMO.

The simple modelling detailed in Annex C of the report uses figures for device density and the traffic per device to determine the overall traffic offered in a given environment. It takes into account approximations for Wi-Fi protocol efficiency (60%) and the network protocol overhead (65%). It also assumes that all devices are located at half the maximum range, imposing another throughput degradation (50%). Backhaul via both mesh networking and by Ethernet was considered.

For the case of the residential block, with 9 apartments each with a Wi-Fi network serving 1.5 people, demand exceeds capacity in 2021, when a total user data rate of 68 Mbit/s is offered to each network.

C.2 “A Quantification of 5 GHz Unlicensed Band Spectrum Needs”, Qualcomm Technologies, Inc (2016, revised 2023)

This study [2] used detailed simulations to determine Wi-Fi spectrum requirements. It was assumed that 802.11ax (Wi-Fi 6) is used in “dense residential” and “dense enterprise” environments and is required to provide a universal service bitrate of 1 Gbit/s (also 0.1, 0.5, and 2.5 Gbit/s) over 99%²² of the area simulated.

The simulation assumed a modified IEEE model for two cases:

Residential: An apartment block of 30 apartments of 4 rooms each, on three floors, with 10m x 10m apartment footprint. Each apartment is served either by a single AP, or by 4 APs fed by Ethernet or by 60 GHz or 5 GHz (in-band) backhaul.

²² 95% in the ‘residential’ case

Enterprise: An office scenario with 8 rooms, each with four APs, and an overall area of 80 x 40m. Different assumptions were made regarding backhaul (WLAN or Ethernet) and MIMO order (2 - 8 antennas).

The modelling assumed 802.11ax features (numerology, use of colouring) and 20, 40, 80 and 160 MHz channel bandwidths, with transmit beamforming and MIMO. Optimal channel planning was assumed.

The modelling uses an iterative process, testing different frequency re-use factors and choosing the optimum. It is noted that *"using the best reuse factor and smart channel selection to compute the final bandwidth requirements leads to a conservative estimate of the necessary bandwidth"*

For the 1 Gbit/s benchmark, the lowest spectrum requirement (420 MHz) came from the use of Wi-Gig (60 GHz) for the user link, while the highest (1280 MHz) was for the residential case with 1 AP and 4-antenna user terminals. In most cases, 160 MHz bandwidth mode was found to be necessary (but only 80 MHz where Ethernet backhaul, 60 GHz user links, or 4x4 MIMO were assumed).

The conclusion (2017) is that regulators should plan for *"around 1280 MHz of unlicensed spectrum centred around the 5 GHz band"*. This compares to the 1060 MHz currently available in Europe.

The study was updated in 2023, though not published except as a presentation to the UK Spectrum Forum. In this version, the simulated environments are the same. The new model assumed 6 GHz spectrum is available with LPI indoor power levels²³ and assumed Wi-Fi 7 (802.11be) technology. This allows both 5 and 6 GHz spectrum to be used, with channel bandwidths up to 320 MHz. Other modelling assumptions are the same.

The use scenarios are slightly different. There is no mention of 60 GHz. All APs are now 4-antenna, with all STAs being 2-antenna. The "residential 4AP, 2 Ant, Ethernet backhaul" scenario requires ~650 MHz (was ~480 MHz) while the Enterprise scenario needs 1250 MHz (was ~1250 MHz, for E1 with 2-antennas).

No 'conclusion' but final slide shows *need for total of between 600 MHz and 2400 MHz of spectrum*.

C.3 "Wi-Fi Spectrum Needs Study", Quotient Associates for Wi-Fi Alliance, 2017

Traffic offered

The starting point for this study [4] is an estimation (Section 1.1.2) of traffic expected to be offered in 2025. This is based on a survey of data from the UK, Germany, Korea and the USA. With the assumption that all traffic occurs in four "busy hours" each day and extrapolation to 2025, a figure of 4.5GB/person for the *average* traffic volume in a busy hour is derived. Office traffic is assessed (Section 1.3, Cisco VNI data) to be a quarter of the residential rate.

It is asserted that busy hour traffic is growing at a much faster rate than average traffic, as this period is dominated by video streaming (see Table 1-1). Busy hour rates are therefore set at 150% and 115% of average in 2020 and 2025 respectively. In addition, "upper bound" rates are also assumed based a 200% and 400% uplift from average respectively. With respect to the upper bound rate the report notes that *"it seems far from being out of the question that such volumes might occur. On the other hand it is significantly higher than any prediction we have seen reported elsewhere"*

Finally, the residential demand is set to twice the office demand, due to the use of self-backhaul. The final values (busy hour, 2025) are 5,063 MBytes/person (office) and 20,250 MBytes/person (residential).

²³ LPI or 'Low-power (indoor)' operation implies the use of a maximum 5dBm/MHz eirp, rather than the 36dBm (absolute) eirp permitted for 'Standard Power' operation. This gives 27 dBm for a 160 MHz channel, 30 dBm for 320 MHz (reaches absolute limit at 1260 MHz bandwidth).

Use cases, technologies and model inputs

A mix of devices (smartphones, laptops, tablets) is assumed, which is relevant for determining the population of different MIMO orders. Residential settings have a higher proportion of smartphone use (75% versus 50%). LTE use at 5 GHz is not modelled, but it is assumed that some 60 GHz Wi-Fi networks are available (10% of office networks, 20% residential).

The physical environments for office and residential scenarios are based on the IEEE assumptions [3]. A 30x300m shopping mall is also defined.

Model

Details of the model used are set out in the appendices.

Access point density is set as one per 100m² for the office and residential cases (corresponding to one AP per apartment in the residential case). There are 10 people per 100m² in the office and four in the residential case (i.e. four people per apartment). Each person has three "machines"; if these are active terminals this seems a surprisingly high figure.

A transmit power of 20dBm is assumed and an I/N criterion of 10dB applied at 5 GHz. The model runs as follows:

- Setup
 - Set physical environment and offered data
 - Place APs on rectangular grid
 - Assign channels (planned or random)
 - Place users
- Run
 - Find closest AP
 - Get all pathlosses, thus C/N+I
 - If an AP is > interference threshold, assume terminals will back off
 - Add non-Wi-Fi interference
 - Use look-up table to convert C/N+I to max data rate.
- Calculate transmit time per user
- Add total time per AP
- build congestion histogram

Evaluation

The evaluations have been based not on maximum speed (which is a matter of AP layout as much as spectrum) but on overall capacity. The key metrics chosen are:

- Percentage of offered traffic that is carried (target is 95%)
- AP utilization (that percentage of airtime that an AP observes as being utilised, both by itself and other neighbouring co-channel networks. Target is 70%).

The report notes the complexity of allowing for multiple bands, and therefore opts to deal with "generic" spectrum, nominally at 5 GHz, but the results could be generalized in the range 2-10 GHz.

Assumes *random channel assignment*, unlike the Qualcomm report which assumes optimization (this may only be for the residential case).

It is assumed that a minimum of four channels must be available to exceed excessive interference. The results for an 80 MHz bandwidth therefore begin at 320 MHz, those for 160 MHz bandwidth at 640 MHz.

Results

The results for the busy hour in 2025 are reproduced below.

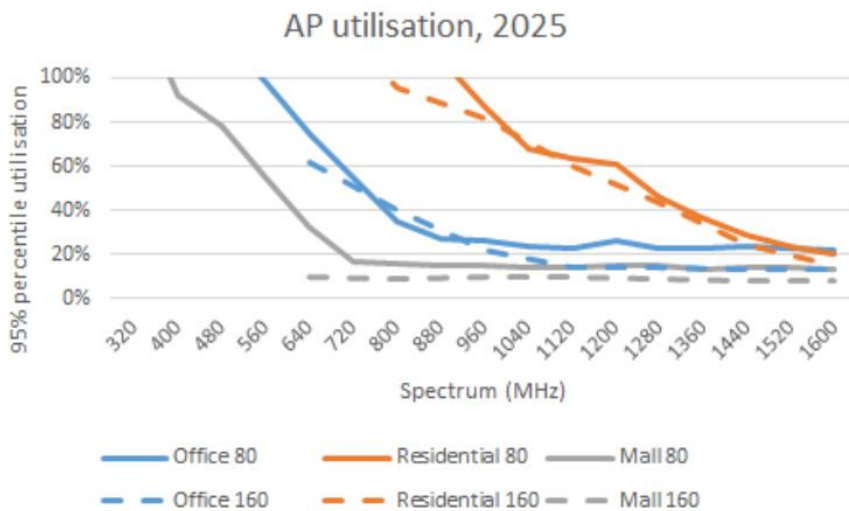


Figure 4.1: Busy Hour scenario, year 2025, using 80 and 160 MHz channels (Fig 5-3 in [4])

It is concluded that, based on busy hour results and the worst case residential scenario, there will be a need for 1120 MHz of available spectrum in 2025 (the equivalent upper-bound figure is 1920 MHz).

The final result (Report Figure 5-5) shows the impact of different power levels. Reducing the power by 10dB reduces spectrum requirement significantly, but this will be at the expense of overall throughput as the network becomes noise-limited.

C.4 2023: “Sustainability Benefits of 6 GHz Spectrum Policy”, WIK consult for Wi-Fi Alliance

Authors: Ing Peter Kroon, Ilsa Godlovitch, Dr Thomas Plückebaum

This report [5] is a very different report that examines the link between spectrum availability for Wi-Fi and environmental impact.

It is suggested that insufficient spectrum availability for Wi-Fi would cause 15% of the data traffic to shift from Wi-Fi networks to 5G mobile networks. This would require 16% more energy, which translates to 3.2 megatons of additional CO2 emissions in Europe per year.

The link between lack of spectrum and displaced data is taken from simulation work by Intel [6], which focusses on latency as the criterion of most relevance. The summary of the Intel work reports that “it is demonstrated that in moderate to high traffic load environments, e.g., enterprises, industrial plants, homes, hotspots, the availability

of a single 320 MHz channel is insufficient to meet the KPIs of these emerging applications. In particular, the latency performance goals cannot be met while maintaining the required reliability target. It is also shown that only when three non-overlapping 320 MHz channels are available can the latency performance and reliability be kept at acceptable levels, including for highly loaded scenarios”.

C.5 Summary of studies

Salient points of the earlier studies are summarised in the table below.

Table C.1: Summary of earlier studies

	Offered traffic	Environment	Model	Conclusion
Plum (2013)		Apartment block, Terraced House, Office block, Transport hub	High-level	Additional (e.g.320 MHz) spectrum required by 2016
Qualcomm (2016)	1 Gbit/s per user in 99% of area	Residential, Enterprise	Detailed simulation (PHY)	Total 1280 MHz spectrum required
Qualcomm (2023)	1 Gbit/s per user in 99% of area	Residential, Enterprise	Detailed simulation (PHY)	Total 1250 MHz spectrum required
Quotient (2017)		Office, Residential, shopping mall	Detailed simulation (PHY)	Total 1120 MHz required
Intel (2023)	30 Mbit/s x 8 per AP + 100 Mbit/s x 8	One, two, or three rooms, each with a BSS. Requirement for 360 MHz channel assumed.	Detailed simulation (link-level)	960 MHz total required

It is interesting to note that in the Quotient study, the spectrum requirement is set by the residential case, while for the Qualcomm study it is the Enterprise scenario that determines the requirement.

It may be relevant that the Qualcomm study uses a modified version of the IEEE Dense Residential environment, with a footprint of half the area and only three, rather than five, floors.

The 2023 Qualcomm study is taken as a template for the scope of the present study.

Quotient: 1 x 20dBm AP per apartment

Qualcomm: 1 or 4 AP per apartment. 27dBm or 30 dBm (160/320 MHz) AP.

C.6 Path-loss models

C.6.1 IEEE

The IEEE document proposes the following models:

For the residential case:

$$PL(d) = 40.05 + 20 \cdot \log_{10}(f_c/2.4) + 20 \cdot \log_{10}(\min(d,5)) + (d > 5) \times 35 \log_{10}(d/5) + 18.3F^{(F+2)/(F+1)-0.46} + 5 \cdot W$$

- d = max(3D distance [m], 1)
- f_c = frequency [GHz]
- F = number of floors traversed
- W = number of walls traversed

For the enterprise case:

$$PL(d) = 40.05 + 20 \cdot \log_{10}(f_c/2.4) + 20 \cdot \log_{10}(\min(d,10)) + (d > 10) \times 35 \cdot \log_{10}(d/10) + 7 \cdot W$$

- d = max(3D-distance [m], 1)
- f_c = frequency [GHz]
- W = number of office walls traversed

In both cases, lognormal shadowing is assumed, with a 5dB lognormal distribution.

C.6.2 Qualcomm

The Qualcomm model assumes a loss of 11 dB for walls and 18 dB for floors. Other details of the path loss model are not given. It is, perhaps, implied that the IEEE models are used.

C.6.3 Quotient

The reader is directed to Appendix B for the path loss coefficients, but none are given there.

C.6.4 ITU-R P.1238

The 'site specific' model has the following form:

$$PL(d) = 20 \cdot \log_{10}(f) - 28 + N \cdot \log_{10}(d) + Lf(n)$$

- N = distance power loss coefficient
- d = distance [m]
- f = frequency [MHz]
- $Lf(n)$ floor penetration loss factor (dB) for n floor intersections

Although no values for N are given for frequencies below 28 GHz²⁴, values for $Lf(n)$ are specified:

- House, Single floor, concrete, 5.2 GHz: 13 dB

²⁴ An older version of the Recommendation gives $N=31$ at 5.2 GHz

- Apartment, Single floor, wood & mortar, 5.2 GHz: 7 dB
- Office, Single floor: 16 dB
- Office, 5.8 GHz: 22 dB (1 floor), 28 dB (2 floors)

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