**Sweden’s Comments on Draft ECC Report 358**

**1 Sources**

**Administration/Company/Entity: PTS**

**Name of contributor: Joakim Quensel**

**2 General Comments**

**3 Proposals related to the CEPT Report**

| **Comment number** | **Section number**  **Clause** | **Paragraph**  **Figure**  **Table** | **Type of comment**  (General,  Technical or  Editorial) | **Comment** | **Proposed change** |
| --- | --- | --- | --- | --- | --- |
| SWE1- SWE19 |  |  |  | See annex | See annex |
| SWE20 | 7.2 | Entire chapter |  | This study deviates from agreed methodology and only examines interference from one single transmitting DECT station.  While conclusions from 3GPP-based studies emphasize the necessity of coordination with MFCNs, this study assumes a completely random placement of a DECT devices, lacking any coordination or minimum distance from a MFCN base station. Given that this study does no attempt to analyze the cumulative interference from a local area network, deriving meaningful conclusions on co-existence with adjacent MFCN is difficult Nevertheless, it anything the results suggest that similar considerations would apply to DECT networks, necessitating geographical and/or frequency separation.  During the PT1 work, when this study was scrutinized and criticized, the DECT Forum opted not to justify its methodology but rather pointed to the use of methodologies in some prior studies (referring to irrelevant SRD-studies and a DECT study from 2004).  Despite its limited impact on the overall conclusions of the report, Sweden stresses the importance for the ECC to maintain a standard of quality control. Consequently, Sweden asserts the significance of withholding the study from publication in an official ECC Report | Do not include the study “Between DECT-2020 NR and MFCN below 3.8” |
| SWE21 – SWE24 | 7.2 |  |  | If ECC do decide to keep this study, Sweden proposes the changes SWE22 - SWE 25 | See Annex |