Public consultation on:
"Mobile technology evolution – experiences and strategies"

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Technology neutrality and 2G/3G phasing out

It is essential to avoid deviations from the principle of technology neutrality for all services including Emergency Services and eCalls. The main purpose is to guarantee the most efficient use of the radioelectric spectrum. The regulatory framework should encourage the phasing out of older technologies and to support the evolution and the adoption of new technologies which use the spectrum in an efficient manner.

The request of additional frequencies for IMT services would be moot if the spectrum already assigned will continue to be used in an inefficient manner.

It would therefore be most appropriate for all member states to adopt a migration plan for the phasing out of 2G and 3G technology.

Commission delegated regulation of 16 December 2022 supplementing Directive (EU) 2018/1972 of the European Parliament and of the Council with measures to ensure effective access to emergency services through emergency communications to the single European emergency number '112' goes in this direction. It would also be appropriate to review the eCall Regulation (EU) 2015/758 to overcome its existing limits and include the emergency protocol into the

standards mandatory for VoWiFi (Voice over WiFi) and VoLTE calls.

A definite time horizon phasing out is necessary also considering the difficulties to maintain 2G and 3G beyond the decade as the availability of spare parts might not be adequate.

Competitive aspects

Part of the current mobile network operators were on the market when 2G/3G were launched (the only technologies available in the '90). Maintaining 2G/3G networks for a long time for services provided only by incumbent operators may determine an anti-competitive situation. Legacy services provided in 2G and 3G technologies may constitute a non-competitive scenario.

Emergency Calls and eCalls

It is essential to move on to a technology neutrality approach also for Emergency Calls and eCalls.

Adopting outdated mandatory technology for eCall services now makes it extremely difficult to move away from the old technologies as far as an emergency service is concerned.

It is unfair that a new service such as eCalls, that was introduced on production cars starting from 2018, is still based on obsolete technology.

A prompt solution must be provided. A possible one is to reserve, for an adequate timeframe, a small portion of the 2G band for eCall emergency services only. No other services should remain on 2G-3G networks after a certain date to be defined at EU level.