



## **ETNO comments on Draft RSPG report: Mobile technology evolution – experiences and strategies**

ETNO welcomes the draft RSPG report on mobile technology evolution. We reaffirm the stated benefits of migration to newer technologies, i.e. packet-switched communications networks, and the advantages for energy efficiency, improved spectrum efficiency, security features, data speeds, but also the wider societal benefits that these enable across the economy. Furthermore, we welcome that, in identifying obstacles to the smooth phase-out of legacy technologies, and the timely uptake of next generation connectivity, the RSPG has pointed to the initiatives being taken by industry, such as transparent announcement of phase-out plans (already the case both publicly, and in business relationship between operators and providers of IoT services), and the ongoing work to facilitate next generation eCall, and ensuring the implementation of standards to guarantee emergency communications on VoLTE and VoWiFi. While we agree that MNOs are in the best position to design and communicate timelines and targeted campaigns and incentives to affected customers, Member States could consider together with MNOs if public initiatives, campaigns or incentives could be beneficial for ensuring a smooth migration.

ETNO notes that the conclusions of the report recognize the importance of technology neutrality and indicate that no need for regulatory intervention has been identified to extend lifespan of 2G/3G from spectrum regulatory perspective. We fully support these conclusions, and hope RSPG continues defending the principle of technology neutrality.

As the RSPG notes, it is important to analyse the possible impact of any policy deviating from the principle of technology neutrality, and to respond to any challenges arising from this, taking note of the different stages of development of wireless technologies in Member States. In this vein, we welcome the serious consideration which has been brought by the European Commission and industry bodies to address the future of existing services, most notably eCall.

### **eCall**

Work is advancing in the European Commission, and there has been a longstanding dialogue between MNOs, automotive OEMs and the other relevant parties, to explore solutions to the twin obstacles of eCall: adapting the legislation to permit the installation of NG eCall modules in vehicles, and dealing with the considerable legacy fleet on the roads. In this regard, we welcome the conclusion of the first part of the study contracted with IDIADA by the European Commission, which support the move from CS to PS networks as the most efficient scenario, for a new regulation to be in force from 2025 to reap the greatest benefits, and for all categories of vehicles to be integrated into the regulation and thus be equipped with (NG) eCall.

However, we regret that some solutions appear to continue being disregarded (e.g. retrofitting and/or aftermarket solutions), with more complex and costly proposals (e.g. eCall via satellite) being considered in some quarters. The report states that, according to car manufacturers, retrofitting of vehicles is not possible due to the type approval regulation, while aftermarket solutions may not be reliable and are costly for the consumer. The European Commission has sponsored the sAFE project with EUR 5.3 million, main aim of which was to find a solution for retrofitting vehicles as a result of the current eCall solution becoming obsolete. This project was concluded in December 2021, but no results have been communicated from the project. It should therefore be regarded as premature to rule out a solution of retrofitting vehicles equipped with the legacy eCall solution.

### **Voice over LTE (VoLTE)**

We welcome the attention given to the issue of emergency calls via VoLTE, and the recognition that industry is working to ensure that the relevant standards are implemented correctly, testing undertaken, and appropriate

VoLTE roaming agreements are in place, in order that consumers will continue to be able to access emergency services regardless of handset or operator, when we move to a fully packet-switched environment.

### **Technology Neutrality**

We support the report's finding that it is imperative that MNOs retain the liberty to deploy new technologies in order to maintain relevance for customers and gain competitive market advantage. As already provided to the RSPG, current spectrum will be refarmed for the support and roll-out of 4/5G mobile networks. The move to Packet Switched mobile networks will assist MNOs in contributing to the Green Agenda by optimizing energy consumption and ensure the security in mobile networks. This prerogative is secured in the long-standing regulatory principle of technology and service neutrality, which also provides regulatory certainty for any type of provider of telecommunication network and services.

### **Security**

It is expected that from 2025, vendors will no longer be providing security patches to circuit switched mobile networks. It is therefore also a matter of security that operators are not hindered in their evolutionary move to packet switched networks.

### **Standardisation**

Standards for the support of NG eCall have all been concluded. This topic is regularly being brought up as a stumbling block for moving to Next Generation eCall, and it should be recognised by the European Commission that this is not the case.