



**Public Consultation on the Draft RSPG Opinion on
The development of 6G and possible implications for spectrum needs and
guidance on the rollout of future wireless broadband networks**

EOLO S.p.A.

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About EOLO

EOLO is the Benefit Company operating in the telecommunications sector at national level with the mission of connecting small municipalities and rural areas to ultra-broadband services. Today EOLO is the first FWA operator in Italy for the residential and business market with 650.000 customers (Source: Agcom).

The EOLO network is active in more than 6,900 municipalities thanks to 4.100 BTS and more than 17,000km of fibre optic backbones.

This commitment to inclusive digitisation of the country has also been recognised through the B Corp certification received in January 2023. EOLO is the first telecommunications operator to become a B Corp in Italy.

For more information, visit www.eolo.it

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EOLO welcomes the opportunity to provide feedback on the Draft RSPG Opinion on “The development of 6G and possible implications for spectrum needs and guidance on the rollout of future wireless broadband networks”.

Below we provide the position of EOLO with reference to the most relevant issues also in consideration of the experience of the company as the first Fixed Wireless Access operator in Italy both in terms of clients and network coverage.

Review of 5G development in Europe - State of Play of the 26 GHz band

Regarding the 26 GHz band, RSPG states that *“The 26 GHz band is subject to different timings and implementations in MSs. The roll-out of 5G has been slow even in those MSs that have made this band available to the market”*.

However, RSPG also recognizes that *“initial commercial use (including by verticals) has started and is expected to increase as equipment availability improves in the coming years and MNOs are willing to densify their networks (e.g. in hot-spot areas) where user demand increases **or for implementing fixed wireless access solutions**”* (emphasis added).

EOLO agrees with RSPG on the evidence that the 26 GHz band still needs time to be fully exploited through the implementation of 5G services but, at the same time, it recognizes that the demand for mmWave trials and projects is rapidly increasing across Europe, including Italy.

In our specific case, **we can confirm a strategic interest in the band concerned, which we consider to be of crucial importance for the deployment of a very high capacity network (VHCN) capable of supporting high-quality fixed wireless services**. To that effect indeed we are engaged in the development of the plan for the use of the 26 GHz band with a 5G perspective for the provision of gigabit internet services.

As known, the EU has established ambitious targets under the “Digital Decade Policy Programme 2030”. To achieve the connectivity target – serve all European households by a Gigabit network by 2030 - a strategic choice is required to promote the synergetic use of all available technologies to provide high-performance connectivity services.

That being said, **the use of the 26 GHz band for harmonized 5G services is of crucial importance for the development of VHCN**. The evolutionary scenario of FWA technology through 5G uses has long been recognized at European levels.

In the study commissioned by the EC from the European Investment Bank, FWA technology is considered one of the 'key trends' of 5G capable of solving 'the last mile problem' and enabling 'the establishment of a relatively quick and cheap broadband service, even in areas lacking ready access to fixed-line home broadband'.¹ FWA has also been recognized by BEREC as “one of the early

¹ European Investment Bank (EIB), “Accelerating the 5G transition in Europe. How to boost investments in transformative 5G solutions”, february 2021



developed business cases” for 5G since “has emerged as one of the early 5G use cases offering gigabit connectivity”².

Finally, a recent study commissioned by the European Commission³ highlights the importance of FWA technology to provide connectivity in rural areas where fiber investments are not sustainable and would require significant private and public resources (through state aid).

In Italy, FWA is of strategic importance given the complex orography and the spread of low-density areas where the deployment of a fiber optic cable network is not technically or economically viable. For such reason, it is worth noting that FWA has been considered as a valuable solution in the “Italian Strategy for Ultra Broadband - Towards the Gigabit Society” which considers FWA technology as a VHCN solution, enabling the provision of 1 gigabit services, based on FTTH (Fibre to the Antenna) model.

We are however concerned that still today the importance of FWA technology is often underestimated and reference is made mainly to the use of spectrum by MNO for mobile use cases. **In the light of above, it is of utmost importance to include Fixed Wireless Access technology within the European spectrum policy strategy toward 5G.**

EOLO calls on the RSPG in providing more clarity on the various uses of the 5G millimeter wave spectrum, which is not just for MNO (i.e., mobile services), but is critical to providing high quality fixed services that will contribute to Europe's connectivity goals.

Lesson learnt from 5G development in Europe

EOLO fully agrees with the RSPG position when it states that ***“There is a need for long term strategic spectrum planning supported by RSPG Opinions in order to bring about EU harmonisation and regulatory initiatives. Policy/regulatory initiatives are necessary (5G Action plan, EECC) to give visibility for investment and provide legal certainties”.***

We also share the importance of spectrum harmonisation ***“to create confidence in future market giving visibility for long term investment, economies of scale, efficient use of spectrum, better cross border condition”.***

To such purpose it is important to ensure a harmonized approach at the European level for the national spectrum assignment procedures, to promote sustainable investments, especially in the context of setting common targets and auction base price, based on objective criteria. The focus should be on the efficient and effective use of spectrum, e.g., through coverage, sharing and access obligations, rather than looking at the economic return from auctions.

Spectrum for verticals and local networks

² Guide to the 5G Radar, BoR (20) 223

³ WIK Consult study on “Investment and funding needs for the Digital Decade connectivity targets”, march 2023



EOLO takes note that according to RSPG there is an increase of the need for local spectrum and that early forms of spectrum utilisation by verticals are developing at the European level.

As of today, however, it can be seen that very few Member States have allocated portions of spectrum for the exclusive use of verticals. The most common provisions to foster the development of vertical 5G services is to impose sharing obligations on the operator's assigned licences.

In our view, the needs of verticals and local spectrum are still in their primordial state and are limited to a few realities. In Italy for example, the demand for connectivity by the verticals does not seem to undergo significant changes.

The Italian context, in fact - unlike other European countries such as Germany – is mainly characterized by small-medium enterprises which suffer from problems of economies of scale and scope, as well as a skills deficit in the self-production of vertical applications. **There is no market demand for verticals, even with a view to future development, that would justify a spectrum reserve, and verticals' needs can be properly satisfied using networks and frequencies allocated to telecommunications operators.**

EOLO believes that the spectrum leasing solution is capable of fully satisfying the needs of verticals and allows an adequate level of autonomy with respect to licensee operators, even though there is no spectrum reservation, in full compliance with the principle of effective use of spectrum and the rules of a pro-competitive market aimed also at protecting the companies that already had invested in 5G frequency resources.

The company therefore considers of utmost importance to focus on the existing demand and the concrete circumstances of individual states.

Having said that, EOLO is in favor of the widest possible harmonization of spectrum but considers the efficient use of this scarce resource to be of paramount importance. **Different national contexts must be considered to ensure that spectrum is effectively used to meet a concrete demand and avoid both wastage and hoarding of frequencies.**

In light of these considerations, EOLO emphasizes the importance of maintaining a flexible regulation that allows MSs to assess the most suitable instrument on a case-by-case basis.

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A handwritten signature in blue ink, appearing to read "Alessandro Verrazzani", written over a horizontal line.

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