

Cellnex Telecom comments on the RSPG Draft Opinion on Additional spectrum needs and guidance on the fast rollout of future wireless broadband networks.

[Cellnex Telecom](#) (**Cellnex**) welcomes the opportunity to provide comments on the RSPG Draft Opinion on Additional spectrum needs and guidance on the fast rollout of future wireless broadband networks. We are available to collaborate with RSPG on all related issues.

Cellnex is the main infrastructure operator for wireless telecommunication in Europe. Cellnex has made a firm commitment to developing its network, which currently comprises c.120,000 sites and positions to develop new generation networks. It provides services in Spain, Italy, Netherlands, United Kingdom, France, Switzerland, Ireland, Portugal, Austria, Denmark, Poland and Sweden thanks to the investments undertaken to boost its transformation and internationalisation drive.

Cellnex wants to provide its view on mainly two topics, spectrum demand for verticals and private networks and EMF related issues. Also, we provide some comments to the Annex II of the *Draft Opinion* (see Annex I).

- **Spectrum demand for verticals and private networks.**

European industry is looking at the possibilities that the rollout of private communications networks will provide. Industry will benefit from secure and guaranteed communications and will improve their performance by adding elements such as artificial intelligence, edge computing and the development of robotic processes. And spectrum is key to innovation and advance of industries plus for emerging of new players and new service providers to revitalise the value chain.

The vertical application demand for new and innovative services is linked to the implementation of private networks. A private or dedicated network will address business use cases by providing, for example, ultra-low latency requirements or massive bandwidth video processing, some features that a commercial networks would not be able to cope with. These performances of an industry's private wireless network or KPI's are decisive in attaining the required level of connectivity for any particular process. Part of the industry demands these hyper-local networks (e.g. networks with coverage limited only to the industrial site) capable of responding to their specific needs establishing its critical KPI's for the processes and therefore require a dedicated network.

Cellnex believes that a quick identification and allocation of dedicated spectrum for vertical and private networks needs is key for paving the way to the European industry of the future.

Moreover, for the European vertical ecosystem and the European industry in general to benefit from dedicated spectrum to foster innovation and improve its competitiveness, we call policy makers to also address the following issues:

1. Need for European vertical sector to have **long term certainty for the huge investments needed on private networks.**
2. **Time to market** is key for European industry for avoid lagging behind.
3. **European harmonisation** would be desirable in other to build on economies of scale and wider equipment ecosystem.

- **EMF relates issues.**

Cellnex strongly supports the revision of the European Council Recommendation (EC 519/1999) to take account of the updated ICNIRP guidelines. Of course, from a scientific viewpoint, this is clearly a sensible approach to take. However, of equal importance is public confidence in the limits being applied. In this respect, use of up-to-date limits/guidance would appear to be highly beneficial. We have seen how quickly extreme action can occur; for example, arson attacks on masts. Hence, whilst, of course, we do not suggest that this was due to the Recommendation, it is clear that lack of public confidence can have serious consequences.

Although the EMF Directive (for workers) was published before ICNIRP released the 2020 guidance, the Directive does include the 2010 limits for the lower frequencies; moreover, in the higher frequency range, by using 6MHz as the threshold frequency at which the power density basic restrictions begin, it is also in line with the new 2020 guidelines, rather than those of 1998. Hence, while still not completely aligned with ICNIRP 2020, there is closer agreement than is the case with the Recommendation.

Certainly, the impact of updating this guidance should not be underestimated. Currently, the Recommendation is included as a Normative Reference in numerous Standards used as a basis for demonstrating compliance with other Directives, e.g. the Radio Equipment Directive. This has had the result that independent implementation of the ICNIRP 2020 guidance is difficult as the Standards are generally based on the Recommendation; and it is difficult to justify updating the Standards while the Recommendation remains as it is.

Cellnex does not have a strong preference for replacing the Recommendation with a Directive. Of main importance is to have guidance that is recognised; its specific legal status is secondary. The fact that the Recommendation is used by Standards to demonstrate compliance with other Directives makes it clear that it is already an important document.

A measurement campaign demonstrating consistently low levels in areas where the public access should also help to add to public confidence. However, there is the potential to make such a programme even more useful by taking care over the data collected. For example, a simple measurement campaign, recording only the cumulative levels, as a percentage of the ICNIRP reference levels, would help to demonstrate general compliance. But, such a programme would be less useful for other purposes. One way to enhance it, would be to record, not just the cumulative levels but also the levels for each operator in each band. Ideally, this would be carried out in conjunction with the operators, enabling corresponding input powers to be recorded as well. In this way, the programme could also be used to inform modelling and prediction methods in order to enable more accurate modelling to be carried out in the future.

Annex I – Comments to *Annex II: Survey Results Summary of the Draft Opinion*.

Cellnex would like also to provide its view on the *Survey Results Summary* from Annex II of the *Draft Opinion*.

I. Additional Spectrum and Harmonisation Needs

As the long term demand for broadcasting (including coverage of local events) and PPDR is registered in sub-700 MHz bands, we would like to emphasize:

- As Administrations recognize, there is a long term demand for terrestrial broadcasting in the 470-694MHz band. The band is already efficiently used, including terrestrial broadcasting and spectrum sharing with PMSE, radio astronomy and white-spaces.
The band is the only remaining spectrum for terrestrial television broadcasting, including free TV, a fundamental service for the EU society and the European values.
In addition, Europe reached an agreement on the long term use of the 470-694MHz band; according to the UHF Decision¹, *Member States shall ensure availability at least until 2030 of the 470-694 MHz ('sub-700 MHz') frequency band for the terrestrial provision of broadcasting services, including free television, and for use by wireless audio PMSE on the basis of national needs, while taking into account the principle of technological neutrality*.
In summary, the band is to remain for terrestrial broadcasting even beyond 2030 and, according to its own results, RSPG should recommend a “no Change” position on its opinion on WRC-23.
- PPDR services would need spectrum for its migration from current narrow band technologies into wide band solutions. 450MHz band may be an interesting band as it is already identified for PPDR services in some European countries.

II. 5G Networks Roll-out

Regarding the MS considering adopting a light licensing regime for small cells, as an infrastructure provider, we can only support this approach. Indeed, light licensing reduces the time to market and facilitates the roll-out.

At this regard, even we recognize it is really complicated, the possibility of having a greater level of harmonisation at European level regarding the small cells deployment would be really beneficial for the industry.

III. Authorisation

We are struggling to understand the “*Due to low interest expressed by verticals most MSs have not considered dedicating spectrum for vertical use*” point. According to our market knowledge across 14 countries, verticals demand is growing. What we do really see is verticals facing huge uncertainty about spectrum access (or a lack of it in most of the cases) and this is delaying and undermining investment decisions, impacting on the European competitiveness.

Perhaps policy makers should further investigate the “*low interest expressed by verticals*” to understand the reasons and act accordingly. As we have seen a growing presence of different associations of verticals users aggregating its demands for spectrum, one possible way forward would be for RSPG to liaise with them.

¹ <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32017D0899>