

AUTOMOTIVE INDUSTRY RESPONSE
TO THE RSPG CONSULTATION ON THE DRAFT PUBLIC CONSULTATION ON THE DRAFT
RSPG OPINION ON ADDITIONAL SPECTRUM NEEDS AND GUIDANCE ON THE FAST
ROLLOUT OF FUTURE WIRELESS BROADBAND NETWORKS

25 March 2021

ACEA and CLEPA strongly welcome the opportunity to comment on the Draft RSPG Opinion on additional spectrum needs and guidance on the fast rollout of future wireless networks. As already stated in our response to the RSPG consultation and with a view to achieve the desired levels of connected and automated mobilityⁱ, we strongly support:

- Continuous cooperation with national frequency regulators and the European Commission related to spectrum needs for advanced use cases, in terms of Intelligent Transport Systems (ITS) spectrum for direct communication and safety applications,
- Continuous work to improve wireless networks coverage and quality of service along roads, together with seamless cross-border roaming, allowing for use cases requiring network based connectivity, as well as added value infotainment services to be further deployed.
- Initiatives to support and promote innovation for smart manufacturing (Industry 4.0) by exploring the benefits of the various types of spectrum authorization methods (e.g. nation or EU -wide licensing, local licensing).

In particular, relating to the RSPG Opinion / Report, we would like to focus on:

- Point 2.: We share the views of the RSPG and acknowledge the reasons behind the different approaches to handle spectrum needs at national level. However, we would like to encourage the Member States to consider the needs of all verticals when assessing and setting priorities for efficient spectrum use, the automotive and manufacturing industries being among these.
- Point 3.: We can confirm the interest of our industry vertical on mmWaves. However, it is important to understand that the interest of manufacturing on mmWaves does not reduce the importance of e.g. mid-bands for our innovative use cases.
- Point 5.: We fully agree that the right balance between different types of authorization methods would facilitate innovation and different technologies (e.g. nation-wide licensing, local licensing). Local licenses are an enabler for a wide range of cooperation models for connectivity.
- Point 6.: We welcome the initiative for studies of 3.8-4.2 GHz for local vertical applications. However, this initiative should not lead to the conclusion that other frequency ranges for local licenses in the mid-band frequencies are not necessary.
- Additionally, we would like to express that it is not necessary to have just one common harmonized band for local verticals throughout all Member States. It is important to have

at least 100 MHz in the mid-band range that can be handled by the same chip (to ensure economies of scale).

- Point 7.: We support and welcome the RSPG recommendation to develop different options to address the vertical needs in the mmWaves.
- As an important general remark, we would like to emphasize that, so far, chipsets supporting IMT technologies for local networks are not available. Therefore, we expect a higher demand for dedicated spectrum by verticals in the next years.

ACEA, the European Automobile Manufacturers' Association, represents the 15 Europe based car, van, truck and bus manufacturers: BMW Group, CNH Industrial, DAF Trucks, Daimler, Ferrari, Ford of Europe, Honda Motor Europe, Hyundai Motor Europe, Jaguar Land Rover, Renault Group, Stellantis, Toyota Motor Europe, Volkswagen Group, Volvo Cars, and Volvo Group.

More information: www.acea.be

CLEPA, the European Association of Automotive Suppliers based in Brussels, represents over 3.000 companies, from multi-nationals to SMEs, supplying state-of-the-art components and innovative technology for safe, smart and sustainable mobility, investing over 25 billion euros yearly in research and development. Automotive suppliers in Europe employ about five million people across the continent.

More information: www.clepa.eu

ⁱ As highlighted in the ACEA position paper on spectrum needs

<https://www.acea.be/publications/article/acea-clepa-paper-future-c-its-spectrum-needs>, the Car2Car Communications Consortium White Paper on Road Safety and Spectrum Needs in the 5.9GHz for C-ITS and Automation Applications, 20 February 2017 and 5GAA Spectrum Needs Study for safety related Use Cases: https://5gaa.org/wp-content/uploads/2020/06/5GAA_S-200137_Day1_and_adv_Use_Cases_Spectrum-Needs-Study_V2.0-cover.pdf