

**Telecom Italia response to  
DRAFT RSPG WORK PROGRAMME for 2011  
(RSPG10-346 Draft)**

15 January 2011

## Introduction

Telecom Italia welcomes the Radio Spectrum Policy Group invitation to express comments and views in relation to the draft RSPG 2011 Work Programme. We generally agree with the list of topics proposed as draft work program, although in our opinion a priority should be given to spectrum allocation aspects that may have a bigger impact on the market dynamics or to the rapid development of new technologies that should be considered more attractive from an economic and commercial point of view.

In our view it is very important that not only Member States and the European Commission, but the whole industry as well acquire a common reference on the objectives and the main themes to be treated at different levels, taking into account European positions and priorities. In this context, a central role should be given to RSPG Opinions and Reports.

First of all, as the RSPG Work Programme is of utmost relevance and may have a significant impact on the markets, we maintain the importance of the opportunity given to all stakeholders to comment on all the draft RSPG Opinions, Reports or Position papers, within a reasonable period of time.

Secondly, as Telecom Italia's general opinion is that spectrum management is one of the most impacted issues by the review of the European regulatory framework, we support the role of RSPG in facilitating the highest possible degree of harmonization in the transposition process, in particular regarding the impact of spectrum liberalisation on competition, through spectrum trading, technological and service neutrality and the overall authorization regime.

Finally, Telecom Italia has always supported the Commission initiative to develop a multi-annual Radio Spectrum Policy Programme (RSPP) in order to "*set out the policy orientations and objectives for the strategic planning and harmonisation of the use of radio spectrum in accordance with the provisions of this Directive and the Specific Directives*". We therefore underline the importance of a close coordination between the radio spectrum policy and the implementation of the Digital Agenda for Europe, with a strengthened role of the RSPG.

In particular:

## Review of Spectrum use

Telecom Italia agrees on the importance of analysing the demand and the technological trends to determine the actual need of spectrum and on the need of defining suitable policies to provide sufficient resources in order to match the demand and to deliver the greatest collective and economic benefits. The analysis should take into account not only the current spectrum demand, but also the possible future one for the next 10-15 years, since the reallocation process generally requires a long time period.

Considered that CoCom is also conducting a similar exercise (testing with BEREC a new methodology on mobile broadband), with particular regard to the need for Mobile

Broadband usage, we note that it would be important that the two bodies would coordinate their actions, in order to provide for a harmonised view of the market.

Possible spectrum reallocation is a complex and likely expensive issue but, as spectrum is a national asset, governments should seek to find its optimum allocation.

In our opinion, the areas where spectrum use optimization should be deployed are the military, aeronautical radar, satellite services, broadcasting and public safety sectors. In this respect, the frequency range from 300 MHz to 3 GHz might be analysed in order to identify unused assignments and/or not efficient use of spectrum. CEPT could be the right forum to perform such analysis.

### **Collective Use of Spectrum**

Telecom Italia does not deem the development of collective use of spectrum solutions as urgent. In any case we think that collective use should be restricted to specific bands when there is no risk to threaten the investments. This solution should be notably avoided with respect to bands used for quality sensitive services like voice calls or internet.

A specific band, dedicated to collective use of spectrum, should on the contrary enable the test of innovative and experimental technologies, preventing interferences with mature or highly competitive spectrum based services.

In the matter of the TV White Spaces, we consider that this solution could have limited or partial applicability in Europe, due to the intense use of spectrum by broadcasters. A potential benefit could come from the use of this concept restricted to rural areas, since dense urban areas are already heavily exploited by broadcasters.

### **Improving broadband coverage**

In Telecom Italia's view, the broadband seamless wireless services issue is one of the most important topics to deal with in the medium term, therefore we very much welcome the continuation and the deepening of the work on wireless broadband, which has been developed by RSPG in 2009.

We think that this topic should still be at the core of EU policies, as wireless broadband access is one of the most powerful solutions both to expand the digital society, and to fulfil the digital divide project requirements. Wireless broadband also has the potential to improve the commercial and economic value of Electronic Communications

We think that RSPG may play a fundamental role in orientating European policies, especially in harmonizing the possible coverage obligations provided by spectrum authorizations, in monitoring the ratio between the growth of the service demand and the actual availability of frequency resources, and also in preventing spectrum scarcity from implying any restriction for customers on access to content, sites and platforms.

The coverage obligations should not add unjustified costs, which could be burdensome for the operators, considering the intensive investment needed to develop the networks and the conspicuous price expected to award the frequencies.

### **Spectrum sharing and joint RSPG-BEREC work programme**

Telecom Italia welcomes any initiative coming from RSPG and BEREC to facilitate the development of a harmonised, coordinated policy regarding spectrum management, especially in this outstanding phase of transposition of the directives amending the regulatory framework.

We hope that RSPG will monitor the transition to the spectrum regime defined in the new regulatory framework, focusing for example on service and technology neutrality and on flexible spectrum management. It could provide guidelines for new spectrum management principles application, including spectrum trading, that should be introduced in the market in way of facilitating undertakings to operate an electronic communication network so as to improve their commercial performances.

Given the relevance for the market of the topics dealt by the joint work, we consider the importance of consulting with the stakeholders.

### **International coordination of spectrum**

Telecom Italia completely agrees with the necessity to strengthen the promotion of the EU interests in international negotiations and to boost the coordination in bilateral negotiations with third countries and between EU member states.

The effort could also be extended to other international aspects (such as relation with CEPT, etc.) and to improve the monitoring and coordination of the complex activities regarding the main themes of WRC-12, which are of particular interest to the EU policies.

Clearly, in order to achieve the abovementioned goals, a constant assessment of common policy objectives and priorities would be of primary importance. In fact, it would facilitate the involvement of the political level at the earliest possible stage of decision making and would create synergies with other world regions, trying to benefit from potential world-wide economies of scale.

### **Subjects for review and development over the period 2011-2012 (proposal)**

Technological evolution is a matter of utmost importance for spectrum management and Telecom Italia agrees with RSPG in giving the adequate relevance to this issue.

Telecom Italia considers that technological development on spectrum management through current and future research projects at EU and national level, as well as the activities of CEPT and ETSI, may identify the actual emerging technologies. We also agree with RSPG on the fact that, at present, energy savings are likely one of the most hopeful challenges in which industry has to get involved.

Likewise, we think that interference management will be a crucial necessity in the evolving scenario towards technological neutrality and bandwidth intensive services.

Telecom Italia will continue giving its full support to all the activities at stake.