

Radio Spectrum Policy Group – Secretariat
DG CNECT B4: Spectrum – Office: BU33 7/065
European Commission, B-1049 Bruxelles, Belgium

E-mail: CNECT-RSPG@ec.europa.eu

Cellnex comments on the *(Draft) RSPG Opinion on the ITU-R World Radiocommunication Conference 2019*.

Dear Sirs,

Please find enclosed the comments on the *(Draft) RSPG Opinion on the ITU-R World Radiocommunication Conference 2019* from Cellnex Telecom.

Yours sincerely

A handwritten signature in black ink, appearing to be "Jaume Pujol i Huguet".

Jaume Pujol i Huguet

Head of Market Intelligence & Strategy

E-mail: jaume.pujol@cellnextelecom.com

Tel: +34 93 567 89 50

Mobile: +34 627 499 535

Fax: +34 93 503 13 26

[Cellnex Telecom](#) (**Cellnex**) welcomes the opportunity to provide comments on the (Draft) RSPG Opinion on the ITU-R World Radiocommunication Conference 2019 (Draft Opinion). We are available to collaborate with RSPG on all related issues.

Cellnex is Europe's leading operator of wireless telecommunications and broadcasting infrastructures with a total portfolio of 28,000 sites including forecast roll-outs up to 2022. **Cellnex operates in Spain, Italy, Netherlands, France, Switzerland and the United Kingdom.** Our business is structured in four major areas: telecommunications infrastructure services; audiovisual broadcasting networks, security and emergency service networks and smart and IoT services. The company is listed on the continuous market of the Spanish stock exchange and is part of the selective IBEX 35 and EuroStoxx 600 indices. It is also part of the FTSE4GOOD and CDP (Carbon Disclosure Project) sustainability indexes and the Standard Ethics index.

In our double role of infrastructure and service provider, **Cellnex** feels that it is particularly important to have a clear picture on the allocated spectrum for all the different services; IMT, broadcast, ITS, PPDR, etc. This certainty fosters the innovation and investment which impacts on many economic and productive sectors in Europe, increasing GDP and creating jobs. At this regard, we welcome the RSPG work on creating policy levers to provide needed investment certainty for the European digital ecosystem for all different services that need different spectrum allocations.

Cellnex broadly supports the draft RSPG Opinion. However, provides below comments on certain points.

- **4.1 General objective**

Cellnex is fully committed to the common European strategy on the UHF band agreed in 2017; after several years of discussions, European policy makers, regulators and industry have reached a *win-win* agreement for the whole European digital ecosystem captured in the *Decision (EU) 2017/899 of the European Parliament and of the Council of 17 May 2017 on the use of the 470-790 MHz frequency band in the Union (UHF Decision)*.

According to the *UHF Decision*, the European strategy is **to open the 700 MHz band for mobile while maintaining 470-694 MHz for broadcasting as a primary service until at least 2030, consistent with the long-term strategy defined by RSPG earmarking this band in Europe for audiovisual distribution services even beyond 2030.** The European strategy provides certainty for the European broadcasting industry to invest to make available the 700MHz band by 2020 or 2022. At this regard and, according to decisions made in WRC-15, band sub 1GHz are not to be discussed before or during the WRC-19. In this sense, unexpected agenda items should not emerge at the WRC-19.

In conclusion, **Cellnex calls for an unambiguous rejection of any non-agenda UHF proposal on the basis that it would be against EU interest and against the ITU process. Such a proposal can be formally rejected on the ground of the decisions taken at WRC-15 – themselves the result of a carefully compromise between administrations on a contentious issue.**

- **Section 4.5: WRC-19 Agenda Item 1.8 (GMDSS).**
- **Section 4.8: WRC-19 Agenda Item 1.12 (ITS).**

Cellnex supports the RSPG recommendations. We do believe the dedicated resources (spectrum and infrastructure) are key to provide both to ITS and maritime sector the required level of service (including reliability) and would maximise safety, efficiency and deployment & investment in both sectors.

- **Section 4.12: Agenda item 10 (New Agenda items for WRC-23)**

According to decisions made in WRC-15, any confirmed agenda item for WRC-23 regarding sub 1GHz band in Region 1 needs to be in accordance to the Resolution 235 (WRC-15). In addition, when assessing any EU position in this regard, technical but also European creative and cultural perspectives should be taken into account.

About Cellnex Telecom

Who we are

