DIGITALEUROPE

8 AUGUST 2022

Response to public consultation on draft RSPG Opinion on WRC-23

Executive summary

DIGITALEUROPE supports the RSPG's efforts to identify relevant EU policies and law to provide advice on the EU's position towards the World Radiocommunication Conference 2023 (WRC-23), as well as to consider elements on which Member States would like to set common objectives for WRC-23.

Furthermore, we wish to commend the RSPG for the fruitful cooperation between industry and regulators, allowing for a better understanding of the challenges and constraints facing the sector. We encourage the RSPG to continue and intensify exchanges with stakeholders through regular workshops, in addition to the usual public consultations and reports.

In this paper, DIGITALEUROPE elaborates on four key items:

- WRC-23 Agenda Item 1.2 (section 4.1 of the consultation);
- WRC-23 Agenda Item 1.3 (section 4.2 of the consultation);
- WRC-23 Agenda Item 1.5 (section 4.3 of the consultation); and
- Other WRC-23 Agenda Items (section 4.9 of the consultation).

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3300–3400 MHz amend footnote in Region 1

DIGITALEUROPE understands that the draft RSPG Opinion suggests that EU Member States should oppose any IMT identification in the bands 3.3–3.4 GHz. However, DIGITALEUROPE supports additions of Region 1 countries to the relevant footnotes to the extent that compatibility matters are resolved, further noting the possibility of an ecosystem developing, considering use in other parts of the world, and different deployment alternatives.

3300–3400 MHz in Region 2

DIGITALEUROPE notes the availability of an ecosystem in the 3300–3800 MHz range and that IMT identification in Region 2 will not affect Region 1. DIGITALEUROPE suggests that the RSPG Opinion remain neutral in relation to a possible IMT identification in Region 2, in line with the agreement reached at WRC-15. This would also be consistent with the approach for the 3600-3800 MHz band in Region 2, where the draft RSPG Opinion does not suggest a specific position.

3600–3800 MHz in Region 2

While the RSPG has not made a proposal on this matter, DIGITALEUROPE observes that additional IMT identification would further harmonise the usage of one of the 5G pioneer bands.

6425–7025 MHz in Region 1 and 7025–7125 MHz globally

Within DIGITALEUROPE's membership there are two different views on this topic. These are provided below. We also note that the RSPG did not yet define a recommendation on this topic.

View in support of IMT identification	View in support of no change (NOC)
Members of DIGITALEUROPE supporting this option, including the leading EU telecommunications equipment manufacturers, are of the view that an IMT identification at 6 GHz will best benefit Europe.	Members of DIGITALEUROPE supporting this option build and create the majority of the internet's applications and host content. They are of the view that an IMT identification at 6 GHz will negatively

IMT identification is critical to addressing the Digital Decade connectivity goals of gigabit to all households and 5G performance everywhere. The 6425–7125 MHz band represents the only remaining opportunity for additional wide and contiguous mid-band spectrum for licensed macro-cellular public mobile network deployments in Europe, allowing use cases such as the Metaverse for consumers and enterprises outdoors, indoors and on-the move. Allocating this band to RLAN would negatively impact European citizens and businesses, as fixed broadband speeds – rather than spectrum availability – are the bottleneck for Wi-Fi. Just as Europe led in harmonising 3.5 GHz, it now has the opportunity to drive IMT identification of 6425–7025 MHz (Region 1) and 7025–7125 MHz (globally) and the licensed usage of the entire band, noting that most markets in Region 2 and 3 are following WRC-23 and awaiting its outcome. We agree with the RSPG Opinion that sharing between IMT (including macro base stations) and the fixed satellite service allocated to this band is possible. Additionally, coexistence with fixed links can be solved on a	impact broadband speeds and functionality in Europe. Today, in developed markets, 95 per cent of internet capacity is delivered by fixed broadband, and 90 per cent of that capacity is distributed to the end-user by Wi-Fi. IMT in the upper 6 GHz band will add a trivial amount of total internet capacity, while constraining the functionality of future broadband networks that will be capable of at least 20 Gb/s per connection over the coming decade. Some Member States have been touting 6 GHz for 6G, but the band cannot be globally harmonised for IMT as countries representing over 31 per cent of the world's GDP have already authorised the band for use by RLAN.[1] Europe should embrace the opportunity to harmonise with allies in Regions 2 and 3 and build a common platform for connecting broadband infrastructure to AR/VR and Industry 4.0 using licence-exempt technologies, and then seek harmonisation for future IMT generations with its allies in other bands. IMT identifications are associated with high-power outdoor deployments, thus sharing with incumbents (Fixed Satellite Service, Fixed Service) likely requires costly relocation and disruption to services.

[1] This figure is based on the number of countries that have made positive announcements. The following map was used to determine the value: https://6ghz.info/wp-content/uploads/2022/07/6GHz-map-12-July.pdf.

case-by-case basis, as proven by sharing studies at ITU-R.	

Agenda Item 1.3

3.6–3.8 GHz is part of one of the 5G pioneer bands for Europe, and is of fundamental importance for 5G deployment in the EU. Currently, deployments in this band are not guaranteed protection due to the lack of primary allocation for Region 1 in the Radio Regulations.

DIGITALEUROPE agrees with the draft RSPG Opinion and encourages Europe to drive a primary allocation for this band towards WRC-23, noting the primary allocation in Regions 2 and 3 with the same incumbents. DIGITALEUROPE further notes that in order for such an allocation to be relevant there should be no onerous conditions associated with it that could prevent free deployment and further use of existing IMT/MFCN in Europe. DIGITALEUROPE suggests that regulatory action resulting from Agenda Item 1.3 should not imply stricter technical conditions for IMT/MFCN than ECC Dec(11)06 (amended 26 October 2018).

Agenda Item 1.5

In June 2022, DIGITALEUROPE published a position paper detailing our recommendations for the 470–694 MHz band.[2]

DIGITALEUROPE recognises a large diversity in the use of Digital Terrestrial Television (DTT) in Europe in two dimensions: population and services. Some countries have high percentages of population using DTT, whereas others have low percentages. Some countries have a wide service offering, with many nationwide and/or regional/local programmes on DTT, whereas other countries rely on other distribution paths such as satellite, cable and increasingly IP-TV.

Due to such varied use in the region, DIGITALEUROPE believes in some countries there may be scope to utilise the 470–694 MHz UHF band in a more efficient and flexible manner, subject to avoiding interference with existing services. This could provide new options and increased flexibility for distribution of AV content in terms of linear and non-linear delivery as well as support of mobile broadband, which would allow for more efficient use of this valuable spectrum resource.

[2] https://www.digitaleurope.org/wp/wp-content/uploads/2022/06/Creating-Choices-in-470-694-MHz.pdf.

Such options may consider introducing additional mobile use in the band in order to address the digital divide between urban and rural areas in a cost-effective manner and to deliver mobile services to other hard-to-reach places, while ensuring the protection of DTT and PMSE. These options would provide smooth migration paths at individual pace as per Member States' individual objectives supported by a large ecosystem.

DIGITALEUROPE supports a co-primary mobile allocation under WRC-23 Agenda Item 1.5 with the assumption that post WRC-23 CEPT will take the necessary steps to continue protecting existing services and products such as PMSE, DTT receivers and broadcast services, as needed. This provides additional flexibility, which will allow Member States to address their national needs regarding DTT, PSME and mobile.

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About DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies. DIGITALEUROPE ensures industry participation in the development and implementation of EU policies.

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