To: **Radio Spectrum Policy Group**

RSPG Secretariat

CNECT-RSPG@ec.europa.eu

Rome, 25th July 2022

Subject: Public Consultation on the Draft RSPG Opinion on ITU-R World Radiocommunication Conference 2023 – EOLO Contribution

EOLO S.p.A. ("EOLO") is an Internet Service Provider and the main Italian fixed wireless ultra-broadband operator active in the residential and business markets.

EOLO's access network is fully independent from the Italian incumbent and covers more than 6,800 municipalities in all 20 Italian regions, representing one of the most extended fixed wireless access ("FWA") networks in the world. EOLO boasts a leadership position in the ultra-broadband and wireless connectivity services market counting over 600,000 active customers. EOLO's headquarter is in Busto Arsizio (VA) and has offices in Rome and Padua, counting over 500 employees.

Since the Radio Spectrum Policy Group ("RSPG") has launched the public consultation on the draft RSPG opinion on ITU-R World Radiocommunication Conference 2023, EOLO thanks for the opportunity to share its position paper and hereby sends its comments to the public consultation.

For any communication, please refer to Francesco Gianni: e-mail francesco.gianni@eolo.it certified e-mail regolamentazione@pec.eolo.it.

Yours faithfully,

EOLO S.p.A.

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Position Paper of EOLO S.p.A.

FWA, as is well known, is the technology that uses a mixed fiber-radio network architecture to deliver ultrabroadband connectivity services. Therefore, this technology is of strategic importance in countries such as Italy that have many orographically issues and low-population density areas where the deployment of FTTH network is not technically or economically sustainable.

In such contexts, FWA represents a real alternative for offering very high-capacity services; in fact, it has found initial deployment especially in rural areas and represents one of the first 5G use cases.

So much so that, this technology soon distinguished itself as the main solution for the "digital divide" first and the "speed divide" later, having the right characteristics to offer broadband connectivity to households, businesses and public administration offices located in suburban, rural and mountainous areas.

In order to ensure the continuation of these services and the provision of 5G services in the short-medium term, EOLO takes the opportunity of this public consultation to express its position on Agenda Items 1.2 and 1.16.

WRC-23 Agenda Item 1.2 (IMT mid-band identifications)

Regarding the first point, the public consultation states that "*It is further noted that the band 6425-7125 MHz is heavily used by long distance and high capacity fixed links in Europe such as for backhauling*".

EOLO strongly confirms this assumption and would like to emphasize the importance of such use of the 6425-7125 MHz band, in fact any decision on this frequency band **must safeguard the existing high-capacity point-to-point backhauling links, since they are the only means to connect the Base Transceiver Stations ("BTS") in the lack of fiber links**, mostly in rural areas. Moreover, such frequency band is the best solution for fixed links since an alternative might be the 11 GHz band, but the latter is congested in Italy as it is heavily used by broadcasters.

For these reasons, EOLO believes that **RSPG should choose Option 2 so that this frequency band can be used equally by both fixed and mobile operators**. Alternatively, RSPG should choose Option 1 only if, in addition to IMT services, FWA services will be supported and in the particular the latter must be explicitly listed among the services to be protected.

In any case, both Options **should ensure "*the protection of existing and future fixed links*"**.

WRC-23 Agenda Item 1.16 (Non-GSO ESIM Ka-band)

Concerning point 1.16, while recognising the recent development of satellite services, the continuation of current uses in the bands concerned, i.e., the 18 GHz band (to provide point-to-point backhauling links) and the 28 GHz band (to provide Internet access service) should be promoted.

About 28 GHz band (27,50-29,50 GHz), EOLO currently provides fixed services using a nationwide point-to-multipoint access network infrastructure that complies with international standards (CEPT,

ETSI, IEEE) and enables to offer **ultra-broadband services up to 100 Mbps in download and up to 50 Mbps in upload**, to households and businesses customers both at retail and wholesale level, mostly in suburban and rural areas where it is registered a lack of FTTH coverage.

From a technical and regulatory point of view, according to **CEPT decision ECC/DEC/(05)01**, the services that can be supported on this frequency band are:

- fixed services (FS) in 27,8285-28,4445 and 28,9485-29,4525 GHz bands,
- fixed satellite services (FSS) in 27,50-27,8285, 28,4445-28,9485 and 29,4525-29,50 GHz bands.

The regulation provides that **FS stations cannot operate in the bands designated for FSS services and that uncoordinated FSS stations cannot operate in the bands designated for FS services**. However, to operate in part of the band dedicated to FS services, terrestrial stations of satellite services **can require authorization to the public administration**, which grants it after consulting the FS operators that are licensees of the identified frequencies. To date, EOLO has received two requests in 2021 and another two in 2022 to which, after carrying out the appropriate feasibility analyses, it has given a favourable response.

Therefore, given that this band is used for FWA applications in digital divide areas to provide ultra-broadband services where there are no other ultra-broadband solutions, considering also the wide frequency band already reserved for FSS and the existing FS-FSS coordination mechanism that has so far not revealed any criticalities and indeed has proved effective for its purpose, it is deemed appropriate that **the 28 GHz band (and in this case the 27.50-29.10 GHz frequencies) continue to be used by both FS and FSS on a primary basis**.