

ETNO view on the draft RSPG Work Programme for 2020 and beyond

ETNO Contribution

The European Telecommunications Networks Operators' Association (hereinafter ETNO) welcomes the opportunity to provide its views on the **draft RSPG Work Programme for 2020 and beyond**.

ETNO's response mainly focuses on three sections of the Work Programme, namely: "Spectrum Sharing – pioneer initiatives and bands", "Additional spectrum needs and guidance on the fast rollout of future wireless broadband networks" , "Role of Radio Spectrum Policy to help combat Climate Change" and "Peer review and Member States cooperation on authorisations and awards". In addition, ETNO would like to repeat its suggestion for a new work item: "RSPG benchmark on spectrum fees".

Spectrum Sharing – pioneer initiatives and bands

It is true that new technologies evolve and create new opportunities for more dynamic and efficient spectrum sharing. ETNO welcomes the investigation of means to improve spectrum sharing and in parallel would like to stress that for mobile network operators **individually licensed spectrum for exclusive usage** remains crucial for ensuring the quality of service needed for voice and data services in a world with ever increasing needs and complex systems. Exclusive spectrum has been key for success of mobile services and will be essential also for the implementation of 5G technologies with ubiquitous connectivity.

Operators need the certainty of spectrum availability for guaranteeing constant service level for customers, and thus for justifying the investment in deploying the spectrum. For a spectrum sharing solution to succeed, it is important that it meets the needs of the services intended to share the spectrum. From operators' perspective simple, investment-friendly solutions that support reliable mobile services are preferred.

Furthermore, spectrum sharing, even when based on individual rights of use such as licensed shared access, should remain to operators' initiative and should not be imposed. Appropriate incentives may however facilitate the spectrum sharing.

Additionally, when considering shared use of radio spectrum based on a combination of general authorisation and individual rights of use, special care should be taken on seeking to minimise problems of harmful interference as stated in the Directive 2018/1972 establishing the European Electronic Communications Code (EECC) in article 46 (1).

Additional spectrum needs and guidance on the fast rollout of future wireless broadband networks

ETNO agrees that 5G is the most important evolution of wireless broadband in the near future and welcomes the consideration of additional harmonised spectrum to be available by 2025/2030 as proposed by RSPG under this work item. The clarity on the sufficient amount of exclusive spectrum that will be awarded for 5G in near future would enable operators to plan their investments over longer time-period.

ETNO would like to encourage RSPG to take the following elements into consideration:

- It is clear that the outcomes of WRC-19 should be taken into account for the deliverables produced in the scope of this work item. Hopefully also WRC-23 agenda will contain studies interesting to mobile industry. ETNO has proposed to consider the possible IMT identification below 24 GHz, with focus on bands 3.8-4.2 GHz, 6425-7125 MHz and 14.3-15.35 GHz. Review of UHF band is also interesting. For the future expansion of 5G, a timely supply of spectrum below 24 GHz, offering reasonable capacity and propagation characteristics, is of key importance to respond to the intensely growing data usage around year 2025-2030.
- Nationwide licenses on an exclusive basis should be favored as a mean to guarantee a fast deployment of the networks based on the existing footprint. This remains true even for higher bands, as nationwide and exclusive licenses provide the flexibility to use the spectrum based on the need, e.g. very high- speed broadband in densely populated areas, low latency massive machine type communication in industrial facilities, and high capacity fixed wireless access and even backhaul to 5G base stations in more rural areas.
- As 5G is building on the existing 4G footprint, no additional coverage obligations should be considered by the Member States. Such obligations are expensive to fulfill, and ultimately funded directly or indirectly by the taxpayers and consumers. In any case coverage obligations, if any, should not be harmonized in European level.
- Further steps are needed for encouraging 5G investments through the necessary spectrum policy harmonization and predictability across Member States. In this regard, we consider that some aspects such as increased licence duration, deadlines for releasing new spectrum bands, – non excessive - spectrum fees and auction design should be consistent among Member States.
- Slow and costly rollout process would delay the 5G deployment as well as complex administrative site authorization procedures that would burden both operators when submitting the applications and the administrations to process them. To this extent, it is also of the utmost importance that the EMF levels are harmonized all over Europe to avoid that excessively low and unjustified limits will impede 5G network roll-out.

As a final point, ETNO recognizes the importance of high-level workshops with the **all shareholders**, network operators and verticals. They provide opportunities to discuss all the points dealt in this work item and facilitate the creation of RSPG opinions after 360 degrees analysis.

Role of Radio Spectrum Policy to help combat Climate Change

ETNO welcomes the forward-looking addition on the RSPG Work Programme to assess the potential impact of spectrum policies on climate change.

ETNO members are closely following the trends in energy consumption and exploring innovative ways in which the telecoms and digital sector at large can help mitigate the impact on climate change. The telecom sector is one of the best performing sectors in reporting carbon emissions, direct and indirect carbon footprint as well as plans to reduce this.

Exploring mechanisms by which spectrum policies may affect climate change is important and this work should be carried out in cooperation with different digital stakeholders.

In order to support the RSPG's work on sustainability, ETNO would like to express its willingness to contribute to the debate with industry and governments.

Peer review and Member States cooperation on authorisations and awards

ETNO acknowledges that the "Peer Review" platform collects very valuable information on spectrum awards. Considerable benefits can be derived from sharing best practices across Member States which will be further improved if also other stakeholders have the possibility to contribute.

ETNO believes that a number of award processes since 2017 would have benefitted from a formal peer review mechanism, which would have enabled a more efficient allocation of resources, hence, swifter and less costly for the ultimate benefit of end-users.

ETNO recognises that RSPG is a group gathering EU Member States, however an approach similar to the one of ITU should be considered, enabling a proper representation of the industry and of the other key groups of interest. It is acknowledged that this is beyond that scope of in Article 35 EECC but is in the same rational as the existing EECC provisions for the voluntary participation of experts from other competent authorities and from BEREC at the Peer Review Forum. Until then, the industry and other key groups of interest will have only the RSPG report, published yearly in February, as source of experiences and best practices.

Furthermore until 21 December 2020 that the informal RSPG process should be formalized for draft selection measures according the provisions of the Code, and as RSPG should “define in advance and make public the objective criteria for the exceptional convening of the Peer Review Forum”, ETNO proposes a **new deliverable** under this work item. Especially, ETNO proposes that the draft criteria to be published on March 2020 in order for RSPG to publish the final criteria for the exceptional convening of the Peer Review Forum, after public consultation with all shareholders, on November 2020.

ETNO believes that a careful and effective planning of spectrum assignment processes is key to promoting investments and to accelerating 5G deployment and that these processes would also benefit from stakeholder perspectives. To this end, ETNO would like to propose that the RSPG organize a workshop with operators to exchange views on good practices and lessons learnt related to spectrum awards processes. Considering the tight timeline for 5G spectrum assignment, ETNO would suggest such a workshop to be held in early 2020.

Proposition for a new work stream: RSPG benchmark on spectrum fees

ETNO would also like to propose a new work item, “RSPG benchmark on spectrum fees”.

Some key elements such as spectrum fees, yearly or one-time, and the algorithm of calculation, vary considerably among Member States. At the same time, spectrum fees are one of the factors that would encourage, or not, 5G investments. Therefore, in order to facilitate a smooth deployment of 5G networks, ETNO would like to suggest a new work stream that will firstly identify the differences among Member States and then will propose best practices.

Finally, ETNO is pleased to continue to cooperate with the RSPG. For that purpose, apart the high-level workshops, ETNO would like to encourage RSPG to engage more frequently with the industry and to strengthen transparency on the decision making.