

Comments on the scope of the RSPG Work Programme 2020 and beyond

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Introduction

SpectrumConsult appreciates the opportunity to comment on the RSPG Work Programme for 2020 and beyond.

SpectrumConsult provides consultancy services concerning European Radio Regulations and Standards to a variety of customers, national and international, including Qorvo Inc. a global provider of core technologies and RF solutions for mobile, infrastructure and defense and aerospace applications and its subsidiary in the Netherlands, Qorvo Utrecht BV.

Comments on the Work Programme

Recognizing the RSPG role in shaping the long term spectrum policy of the EU, we encourage the RSPG to include spectrum for general authorization in its considerations and to promote the application of the principle of Least Restrictive Technical Conditions (LRTC) in the formulation of compliance criteria for radio equipment.

The RSPG has identified a number of work items to be developed during the next years, we note that it includes valuable initiatives notably with regard to spectrum sharing and making new spectrum available. However, the programme appears rather focused on matters related to the use and sharing of authorized spectrum, e.g. cellular services spectrum and 5G spectrum.

With regard to spectrum sharing the programme states in its opening sentence that spectrum sharing today is “rather static” and “due to this static nature, in some cases overly conservative (putting limiting sharing conditions for new spectrum users or even preventing such new uses)”. This wording suggests a focus on spectrum bands under specific authorization whereas the European Electronic Communication Code emphasizes a preference for general authorization of spectrum bands (see Article 46). This focus is surprising since equipment operating under general authorization and implementing international standards – e.g. Wi-Fi, Bluetooth – and services related to such equipment – carries the majority of all internet traffic worldwide. This capacity is achieved with highly advanced technology that is proficient at sharing spectrum efficiently. The growth of communications traffic to be serviced will require more spectrum – not only for 5G but also for technologies operating under general authorization.

A related aspect, which is covered extensively in the RSPG Report on European Spectrum Strategy (RSPG19-31), is the relationship between spectrum regulation and harmonised standards. Ideally, spectrum regulation should identify the basic requirements - i.e. the Least Restrictive Technical Conditions (LRTC). However, notably with regard to SRDs and other equipment operating under general authorization, existing regulation offers few criteria and leaves the specification of the technical compliance criteria for such equipment to ETSI. This arrangement leads to de facto regulation in Harmonised Standards which in some cases is rather detailed and at odds with the intent and purpose of LRTC and the general goal of facilitating innovation of wireless technologies within the European Union.