

LoRa Alliance Comments on RSPG Recommendations Regarding D2D-IoT SRD

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The LoRa Alliance appreciates the efforts of the RSPG in addressing the strategic spectrum issues associated with Direct-to-Device (D2D) IoT services operating in short-range device (SRD) band 862-870MHz. As a key stakeholder in the IoT ecosystem, we wish to provide the following comments on the RSPG recommendations:

1. Technical Conditions for Satellite Communication with Terrestrial SRD

The LoRa Alliance supports the European Commission's initiative to request CEPT to harmonise possible technical conditions for satellites communicating with terrestrial SRDs in 862-870MHz. It is crucial that those technical conditions (as defined in the ECC Decision¹ under public consultation) ensure compatibility with existing SRD deployments; and do not introduce harmful interference

2. Maintenance of a List of SRD Satellite Operators

We acknowledge the importance of transparency and non-discrimination in maintaining a list of satellite operators providing SRD satellite services in the band 862-870 MHz. However, it is essential to:

- **Clearly define compliance criteria** to ensure that listed operators adhere to harmonised technical and operational conditions without negatively impacting terrestrial SRD services.
- **Implement a periodic review process** for satellite operators to ensure continued compliance with evolving technical standards and spectrum management policies.

3. Authorisation Regimes for SRDs Communicating with Satellites

The LoRa Alliance recognises the need for Member States to develop appropriate authorisation regimes for SRDs communicating with satellites while safeguarding the interests of terrestrial SRD users. In this context, we recommend ensuring harmonised regulatory frameworks across Member States to avoid fragmentation in SRD operations and facilitate seamless cross-border IoT deployments with general authorisations.

Conclusion

The LoRa Alliance remains committed to fostering a collaborative approach in the development of spectrum policies that support both innovation and coexistence in the IoT ecosystem. We encourage continued dialogue with the European Commission, CEPT, and Member States to ensure that any regulatory measures account for the interests of all stakeholders, particularly those leveraging SRD bands for critical IoT applications.

We look forward to engaging in further discussions and contributing to the development of policies that ensure a fair and sustainable spectrum environment for all users.

¹ [Draft ECC Decision \(25\)02](#) on Low power devices communicating with satellites within the frequency range 862-870 MHz

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