



RSPG Consultation

**Connect Europe comments to
the Draft RSPG Opinion on
the EU-level policy approach
to satellite Direct-to-Device
connectivity and related
Single Market issues**

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Connect Europe, the representative of the leading providers of connectivity networks and services in Europe, welcomes the opportunity to provide its views on the Draft RSPG Opinion on the EU-level policy approach to satellite Direct-to-Device (D2D) connectivity and related single market issues.

In our response we focus mainly on the D2D-IMT services, i.e. services D2D in bands used for the provision of terrestrial IMT-based services that have been harmonised within the EU for electronic communications services (ECS).

In the last couple of years there has been a lot of interest on various satellite D2D solutions, while the business opportunities are still unclear in general, but especially in Europe where terrestrial network coverage is good compared to some other regions. We appreciate that the RSPG opinion provides relatively pragmatic status update on the topic. It also identifies a set of issues in areas of spectrum, D2D service protection, authorization and security. However, it does not yet provide clear recommendations to address all the identified issues. For example, we believe RSPG opinion should clearly recommend D2D-IMT being only allowed under MNO licences, based on an agreement with the MNO holding the licence.

1. Satellite D2D using IMT bands is intended to supplement terrestrial mobile coverage – it should not compromise Quality of Service (QoS) or coverage of terrestrial mobile service.

Satellite D2D provides the possibility to supplement mobile terrestrial coverage with a relatively basic service in remote areas or potentially as a backup solution when the terrestrial network is temporarily down (e.g., during natural disasters).

Terrestrial mobile networks provide high quality and high-speed mobile services to the vast majority of European citizens and businesses. Enabling D2D in IMT bands should not compromise the quality and development of terrestrial connectivity.

A key objective for mobile operators is to ensure sufficient protection of terrestrial mobile networks both nationally and across borders while also allowing the development of terrestrial services. The conditions are being studied in preparation of WRC-27, but in order to allow D2D service with harmonized technical conditions in the EU, the EU harmonized framework also needs to be updated.

Connect Europe agree with the RSPG recommendation to issue a mandate to the CEPT to develop harmonized technical conditions for D2D-IMT and amending the

ECS harmonisation decision accordingly. We consider that Europe should be active in the work of studying and defining the technical conditions for D2D to be well positioned to influence the WRC-27 decisions and respond to potential requests from mobile operators wishing to use their licensed frequencies to provide supplemental coverage from space. As also noted in the draft RSPG Opinion, however, **the WRC-27 outcome should be considered when defining the conditions in the EU. Thus, any conditions defined or applied within EU (e.g. for trials or possible bilateral agreements) before WRC-27 should use conservative assumptions.**

In the EU harmonization process, **the possible European specific needs should also be evaluated**, e.g. geographically small countries, number of country borders, number of terrestrial mobile operators, good terrestrial mobile coverage compared to some other regions and consequently small totally uncovered areas. For example, low bands are critical for providing terrestrial mobile services in rural areas, and the terrestrial service is received in low signal levels in some areas (close to rural cell edges). The D2D service in the neighboring country or in adjacent channel may worsen the terrestrial mobile coverage in such areas if the protection criteria are not sufficient. This would be against the principle of D2D supplementing the terrestrial coverage.

The RSPG opinion includes considerations and recommendations to establish common requirements and a common enforcement process to ensure compliance to the common requirements, and procedures when identifying non-compliance. **We support these recommendations as we consider they are relevant tools to ensure protection of terrestrial networks and to support EU single market approach.**

2. Agreement with MNO should be a prerequisite for providing satellite D2D service in IMT spectrum

The RSPG draft opinion brings up three different approaches to introduce D2D-IMT at national level:

- *As an integral part of the terrestrial ECS licence*
- *As a licence for D2D provision requiring cooperation with the terrestrial ECS licence holder*
- *As a licence for D2D provision in geographical areas and available frequency bands not used by a terrestrial ECS licence holder (i.e. not requiring cooperation with a terrestrial ECS licence holder)*

It also concludes that “*In practice, the two last options appear more complex to implement due to current authorisations and the coverage of ECS networks*”.

Connect Europe support this conclusion and consider that the RSPG should provide clear recommendation on this. **Mobile operators should be able to explore the D2D opportunity in their frequencies provided that sufficient conditions to protect the terrestrial mobile service are defined and can be met. However, the satellite D2D service in IMT bands should only be allowed under MNO licences, based on a request of and an agreement with the MNO holding the license** (e.g. in-line with the [FCC Framework to Facilitate Supplemental Coverage from Space](#)).

3. D2D IMT Service Provision

RSPG has identified D2D-IMT service provision issues such as risk for unintentional roaming, emergency calling and numbering issues, or competition issues between providers. We did not see clear recommendations related to the abovementioned issues, and believe that further consideration is needed when developing the EU framework for D2D in IMT bands, beyond spectrum policy considerations.

EU policy should foster competitive provision of satellite D2D for the benefit of all. Thus, it is important to require all satellite providers comply with EU legislation and monitor the competition in the provision of satellite services. In the particular case of emergency communications, we believe once satellite D2D emergency calling is available any user with a compatible handset should have access to it, irrespective of whether it has a retail contract with the mobile licensee. This is the principle that applies for terrestrial emergency calls, and we see no reason for it not applying to D2D satellite calls.

4. Other considerations

While our reply focuses on D2D in IMT bands, we would like to also provide input on D2D services provided in other bands. We believe that satellite providers should also comply with existing EU and national legislation on electronic communication services in those bands.

D2D services in MSS bands – the MSS licences should in general be technology neutral and allow also D2D service provision to various devices. MSS approach may support EU-wide service to modified mobile terminals. If the operators are decided via an EU decision (e.g. as in 2 GHz MSS band) a more harmonized approach may be considered for issuing the licenses (at least single point of contact in EU).

WRC-27 may decide on additional allocations for MSS which might also cover spectrum bands or parts thereof already being harmonized for ECS. We invite

Europe to consider the negative impact of reducing ECS spectrum resources or limiting ECS service when taking a position on these particular frequency ranges.

Connect Europe suggests RSPG to not support any new MSS allocations in harmonised ECS bands or parts thereof, which are studied under agenda items 1.12 and 1.14, and notes that those bands are considered for D2D-IMT, under agenda item 1.13.

Solutions in possible new MSS bands or other bands (e.g. SRD bands) shall not cause interference to services provided in the band or adjacent bands, or limit their future development.

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