

**Deutsche Telekom response to RSPG
Consultation on the
“Draft opinion on the EU-level policy
approach to satellite Direct-to-Device
connectivity and related Single Market
issues”**

28 March 2025

Introduction

Deutsche Telekom (hereafter “Telekom”) welcomes the opportunity to provide comments on “Draft opinion on the EU-level policy approach to satellite Direct-to-Device connectivity and related Single Market issues”.

RSPG has acknowledged the various activities on satellite communication systems. Several of the intended satellite usages require a careful consideration of the regulatory condition under which they can operate. Telekom welcomes the clear RSPG definition of and distinction between different satellite Direct-to-Device solutions to enable the evaluation of potential issues related to the underlying spectrum access framework. However, Telekom noted a mismatch between the structure of the paragraph 2 defining the D2D and the related opinions under paragraph 4. In particular the definition of D2D IoT MSS<1 GHz in 2.5 does not fit with the related opinion in 4.4. Whereas 2.5 limits the considered MSS service to bands <1 GHz the opinion covers all MSS bands. Telekom invites RSPG to further clarify this in the final opinion.

Beside the following comments Telekom supports the comments from Bitkom, ConnectEurope and GSMA.

D2D-IMT

D2D-IMT is the most discussed D2D service since it targets the usage of harmonized IMT spectrum without having a respective satellite allocation in the Radio Regulations. RSPG rightly notes that D2D-IMT is intended to supplement the terrestrial IMT coverage in uncovered areas. Since the level of terrestrial mobile broadband coverage in Europe is quite advanced the business opportunity of D2D-IMT is still unclear. Telekom welcomes the RSPG conclusion that D2D-IMT is not equivalent to terrestrial mobile networks since it is lagging behind the service performance of ECS networks. So Telekom does not see the need to revise relevant coverage obligations.

Telekom supports the view of RSPG to introduce D2D-IMT as an integral part of the terrestrial ECS licenses. This is the least complex and most beneficial way to acknowledge the primary status of ECS networks. It enables mobile network operators to use D2D-IMT opportunity in their licensed spectrum in cooperation with satellite operators under well defined conditions, ensuring the protection of the terrestrial mobile service. Furthermore, D2D-IMT should only be allowed based on the request of a mobile network operator and a commercial agreement between the satellite provider and the respective mobile operator holding the licence.

Telekom welcomes the RSPG recommendation to issue a mandate to CEPT to develop harmonised technical conditions for D2D-IMT and the provisions to properly consider the WRC-27 outcome. As based on the results of a CEPT questionnaire there are currently no commercial requests for D2D-IMT in Europe so Telekom does not see the need to urge the development of a EU wide harmonised regulatory framework before WRC-27. However, in case there is the need to allow respective trials any conditions defined or applied within EU before WRC-27 should be solely based on conservative assumptions on provisional basis.

D2D-MES

Telekom agrees that there is no need to revise the current regulatory framework to allow for these kind of services. Telekom further agrees on the recommendations to improve national spectrum

licensing on the basis of exchange of best practices and in particular the request for improvement MES receiver characteristics to reduce constraints to mobile SDL in adjacent bands.

Although the MSS 2 GHz case is not part of this opinion Telekom invites RSPG to consider the dependency between both issues. Parts of the MSS bands 1980-2010/2170-2200 MHz are currently used to provide a European wide mobile broadband service for connecting aircrafts. This service is widely used and should not be ignored in favour of a D2D-MES solution with a currently not clearly defined business potential.

D2D-IoT MSS

As already referred to in the introduction there is an ambiguity with regard to the considered spectrum bands used for D2D-IoT-MSS. RSPG noted that WRC-27 is considering further MSS allocations under agenda items 1.12 and 1.14. Parts of the considered frequency ranges overlap with harmonized IMT bands and also with considerations for D2D-IMT under agenda item 1.13. To avoid ambiguities in regulation Telekom suggests RSPG to position themselves against MSS allocations in the 2 GHz harmonized IMT band except those considered for D2D-IMT.