BTG Response to consultation "RSPG Opinion on the EU-level policy approach to satellite Direct-to-Device connectivity and related Single Market issues" Issued 14 February 2025.

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Introduction

BTG is a user interest association in the area of ICT and Telecommunications in the Netherlands. BTG represents the interests of Dutch enterprises and organizations dependant on communications services since 1986. Amongst others, BTG organizes network meetings for sharing knowledge and experiences. BTG counts 180 members from business and governmental organizations and represents these organizations nationally and internationally. BTG is member of the INTUG.
BTG interconnects organizations and is actively lobbying between governments, suppliers and members in the area of ICT and Telecommunications. BTG has recognized, and fully supports the strategic value of digital infrastructures for the development of the digital society. Within the BTG association, expert groups are in place where members are sharing interests, knowledge and experience.

Figure 1 provides an overview of BTG's interest groups, demonstrating the breadth of BTG's involvement.

Figure 1. Overview of BTG Expert Groups

The BTG response

This response to the EU Radio Spectrum Policy Group questionnaire on their "Opinion on the EU-level policy approach to satellite Direct-to-Device connectivity and related Single Market issues" has been drafted in close concert with the BTG members, from the perspective of the ICT user, hence the demand side of the market.

BTG membership covers both the demand and the supply sides of the market. In case there is a conflict of interest between these, the demand side opinion has been expressed in this consultation response. Furthermore, this BTG response is not on behalf of the telecom network operators in the Netherlands, who also are BTG members.

Response to the RSPG Opinion.

D2D-IMT services

Definition: D2D-IMT are services direct to device in bands mostly used for the provision of terrestrial IMT-based services that have been harmonised within the EU for electronic communications services (ECS)

BTG agrees with the RSGP that D2D-IMT services can provide coverage that is complementary to the existing terrestrial mobile electronic communications services (ECS) networks, especially in rural, remote, inland water- and sea areas. Also, D2D-IMT services may prove to be highly valuable in case of temporary failure of mobile networks or when mobile ECS networks are temporarily unavailable due to external damage (e.g. flooding or earthquakes).

Apart from D2D-IMT services not being equivalent to mobile ECS networks in terms of traffic handling capacity, BTG notes that they will not solve connectivity issues for indoor areas, where, as is well known, more than 70% of all IMT traffic is handled.

The D2D-IMT services may create interferences to the existing terrestrial ECS services that could result in significant degradation of current usages. This is especially relevant for mission critical services, that BTG notes are increasingly being implemented in The Netherlands and across Europe, e.g. in the 3.5 GHz band and others. BTG fully supports the RSPG opinion that the CEPT should be given a mandate tot develop harmonised technical conditions for D2D-IMT services. Such conditions should explicitly address the specific needs arising from mission critical services that may result in more stringent coexistence requirements than for the commercial (mass market) ECS.

BTG notes that D2D-IMT services may be very useful to users travelling across or along national borders where national ECS coverage may be patchy and variable. D2D-IMT services would be expected to be more stable. D2D-IMT services may similarly be very useful to long distance road traffic that (still) frequently experiences problematic ECS connectivity. However, the use of such services may lead to high cost for the user, which may be unexpected if the activation of the D2D-IMT services is not explicitly visible to the user. According to the BTG, this aspect calls for a national or European regulation whereby the satcom operator(s), possibly in conjunction with the terrestrial MNO(s), will be required to request the user to activate such services. Alternatively, the D2D-IMT services might be made to be part of the current European "roam like at home" conditions.

D2D-MES services

Definition: D2D-MES are services direct to mobile earth stations (MES) in frequency bands specific to a satellite operator

At this moment BTG sees no specific user needs or difficulties that need to be addressed for D2D-MES services as these are only making use of spectrum already allocated specifically to MSS.

D2D-IoT-SRD services

Definition: D2D-IoT SRD are services direct to IoT devices in frequency bands different from ECS harmonised bands and not specific to a satellite operator in short-range device (SRD) bands

BTG notices that for short range devices (SRD) a number of technologies and different frequency bands are being used in the Netherlands and across the EU. For example RFID and LoraWan use the 862-870 MHz band. In general, SRD are subject to a relaxed regulatory regime compared with other radio communications equipment, with technical harmonisation defined in Europe through the SRD Decision.

The introduction of D2D-IoT SRD services may create interferences to the existing terrestrial SRD usages. BTG supports the RSGP view that CEPT should analyse this and create harmonised technical conditions. As appropriate, the European SRD Decision should be amended and specific requirements developed for the D2D-IoT SRD services. Similar to the BTG comment on D2D-IMT services, such analyses and harmonised standards need to properly include the requirements from mission critical services using adjacent frequency bands.

D2D-IoT-MSS services

Definition: D2D-IoT MSS are services direct to IoT devices in frequency bands different from ECS harmonised bands and not specific to a satellite operator in Mobile Satellite Service (MSS) bands < 1GHz.

At this moment BTG sees no specific user needs or difficulties that need to be addressed for D2D-IoT MSS services as these are only making use of spectrum already allocated specifically to MSS.

Security issue

BTG notices that D2D-IMT services are likely to be provided by European wide networks or operators. A first example is the very recent (March 3rd) announcement[1] by Vodafone and AST SpaceMobile that they will create a "100% geographic coverage in every part of Europe to give consumers and businesses access to secure space-based cellular broadband connectivity via their MNO". This will make use of network of ground stations to provide backhaul services from these MNOs across Europe to the satellite network. Hence all satcom user traffic will be handled in these ground stations. This raises the question of how national security requirements may be affected as these ground stations are likely to fall outside of national jurisdiction. This may be a major concern, especially for mission critical traffic, for example when national public safety networks make use of MNO RANs and possibly the D2D satcom services.

[1] https://www.vodafone.com/news/corporate-and-financial/vodafone-and-ast-space-mobile-sign-agreement-to-create-european-direct-to-device-satellite-service-provider

Although the RSPG underlines that Member States manage lawful intercept and national security issues on a sovereign national basis, the above situation may need an additional European level approach.

Access to national markets

The BTG recognizes that the introduction of satcom services, as some form of coverage overlay on top of terrestrial IMT and IoT-SRD services, introduces the potential of non-identical requirements across different EU nations. BTG views that as highly undesirable as it may result in cross-border interferences on terrestrial services, and confuse the service users. Also, it may complicate resolution of cases where the satcom service or operator does not comply with European harmonised standards. Hence, BTG supports the RSPG view that common requirements need to be defined and implemented for D2D satcom services.

BTG views that the recent Vodafone / AST SpaceMobile announcement mentioned above, is a good example demonstrating that the focus of such satcom services will be European wide and not nation specific. As such, this calls for requirements and regulations to be defined at the European level what than needs to be implemented in an identical manner on the national levels.

Access to EU market

In line with the above comment, BTG agrees with the RSPG that a process should be developed to support collective reactions in case a D2D satcom operator does not comply with the EU common requirements for these services in one or multiple countries.

<end of BTG reaction>