

August 23, 2013

**Telekom Austria Group's Comments on the
"Draft RSPG Opinion on Licensed Shared Access"**

Telekom Austria Group (TAG) welcomes the opportunity to express its views and comments on the "Draft RSPG Opinion on the "Draft RSPG Opinion on Licensed Shared Access" via this consultation.

Telekom Austria Group believes that an appropriate regulatory approach for spectrum assignments for mobile broadband must be based on exclusive usage rights in order to ensure an efficient use of the scarce resource. Exclusive access licensing has well known technical advantages and ensures the investment certainty required by market players.

Regulation of spectrum must be consistent over time in order to maintain the ability for market players to engage in long-term investments. Uncertain regulatory frameworks will harm investment dynamics and incentives and will therefore lead to negative impacts.

Exclusive access licensing has enabled the roll-out of broadly available services like mobile internet and will continue to foster the development of innovative services while creating positive effects on investment, competitiveness, economic growth, job creation and social welfare. Furthermore, exclusive usage rights are essential for ensuring that mobile networks are providing the expected quality of service.

The Licensed Shared Access concept should definitely not be applied to bands for which mobile network operators have already acquired exclusive spectrum usage rights. These bands are anyway very efficiently used, as operators have to maximise the return on associated investments. Therefore, mobile networks are a perfect example for the efficient and economic use of spectrum.

However, Licensed Shared Access may be an alternative approach in some circumstances and should therefore be regarded as a complementary instrument to improve the efficiency of spectrum use in underutilized bands. LSA can help to make spectrum available to telecommunications services that are currently assigned to non-commercial services like public administrations, civil aviation and defense.

