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**GSMA Europe response to the draft RSPG opinion on
Review of Spectrum Use**

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About the GSMA

The GSMA represents the interests of the worldwide mobile communications industry. Spanning 219 countries, the GSMA unites nearly 800 of the world's mobile operators, as well as more than 200 companies in the broader mobile ecosystem, including handset makers, software companies, equipment providers, internet companies, and media and entertainment organisations. The GSMA is focused on innovating, incubating and creating new opportunities for its membership, all with the end goal of driving the growth of the mobile communications industry.

For more information on GSMA, please visit: Mobile World Live, the new online portal for the mobile communications industry, at www.mobileworldlive.com, GSMA corporate website at www.gsmworld.com.

In the European Union the GSMA represents over 100 operators providing more than 600 million subscriber connections across the region.

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GSMA Europe would like to thank the Radio Spectrum Policy Group (RSPG) for giving stakeholders the opportunity to comment on the draft opinion on "Review of Spectrum Use".

In response to the public consultation, we would like to make the following points:

- 1. GSMA fully supports the objective of this opinion to enable a spectrum review, based on the inventory according to article 9 of the RSPP decision**
- 2. This activity can help to achieve an optimal exploitation of spectrum resources which may alleviate spectrum scarcity that would endanger meeting the broadband targets of the European Union and slow down the development of mobile communication.**
- 3. GSMA is pleased that to a large extent the draft is already mature and well balanced.**
- 4. GSMA understands that involvement of stakeholders is already envisaged in the draft. GSMA fully supports this course of action and is willing to contribute.**
- 5. The RSPP is the right place to discuss and agree on the future long term needs of spectrum, as it is able to initiate a broad open societal/political discussion.**

Please do not hesitate to contact us if you have any questions.



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1. INTRODUCTION

GSMA Europe would like to thank the Radio Spectrum Policy Group (RSPG) for giving stakeholders the opportunity to comment on the draft opinion on "Review of Spectrum Use".

GSMA would like to stress the importance of this activity, as an optimal exploitation of spectrum resources may alleviate spectrum scarcity. It is of utmost importance for the mobile industry to avoid a shortfall of spectrum which would endanger the growth of the whole mobile business. Therefore GSMA fully supports the objective of this opinion to enable a spectrum review, based on the inventory according to article 9 of the RSPG decision.

Up to now there is no systematic approach for review of spectrum (demand, supply and efficiency of current usage). Only a systematic review of spectrum use which includes an assessment of future spectrum demand will ensure implementation of appropriate measures for a better exploitation of spectrum resources, a realistic assessment of the future spectrum demand that meets the need of market and society.

The inventory according to article 9 of the RSPG decision will help to provide the necessary data to perform such a review.

As to the supply of spectrum the data currently available consists of frequency allocation tables and frequency usage tables. They do not provide information on how efficient an allocation is used and on its significance for the market and the society.

Regarding the spectrum demand side there is even much less information available. Today the demand is normally backed in concrete cases, e.g. by the co-operation process between CEPT and ETSI, – where industry needs to prove sufficient demand supported by a minimum number of companies – or is confirmed by ITU-R studies or similar sources.

2. SPECTRUM DEMAND

Administrations and radio regulatory institutions have been working for a long time to find ways to adapt spectrum allocations to the needs of market and society.

As outlined in the draft opinion, in particular the CEPT-ETSI process has been used for responding to the short-term demands. The co-operation process between CEPT and ETSI has been working quite well and will continue to incorporate impulses from industry in order to adapt the regulatory framework according to the needs of industry.

The long term need is mainly triggered by the World Radio Conferences (WRCs) which are aiming at adapting the radio regulations to the requirements of the market. This process is long term oriented. Each WRC adopts the agenda of the following WRC and interested stakeholders can propose issues to be covered by the agenda via their national administration. Moreover, for radio services of a more regional/local significance, regional groups of administration are free to change their allocation tables according to their specific needs.



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The drawback of these procedures is that there is no systematic approach to assess the real need of the whole society. GSMA thinks that this gap can be closed by an approach for a review of spectrum use and spectrum demand, based on the inventory which will be established by article 9 of the RSPP decision.

With this inventory it will be possible

- to identify spectrum bands where efficiency of existing spectrum uses could be improved,
- to recognise the real long term spectrum demand in Europe.

The RSPP is the right place to discuss and agree on the future long term needs of spectrum, as it is able to initiate a broad open societal/political discussion. However, in order to ensure a target-oriented approach a proper structure of this process is necessary.

For each foreseen new service/application or expansion of an existing service/application it will be necessary to assess the significance by checking different parameters, e.g.

- the social need,
- the economical impact,
- the user acceptance (expected demand/number of subscribers) and
- exploitation of current spectrum resources (in case of growing demand of an existing service/application).

3. SPECTRUM SUPPLY (incl. efficiency of spectrum use)

Today it is nearly impossible to identify any new spectrum which is not already used by another service or application. Most of the bands with favourable propagation characteristics (i. e. 0 – 4 GHz) are already used by or at least allocated to existing services or applications. In order to accommodate a new service or application without new spectrum, it will be necessary to either vacate a band or at least part of it from an existing service or to share the spectrum with the incumbent user. Unfortunately, not all services are suitable to share with another service or to migrate to other frequencies or media.

Therefore it is of utmost importance to collect as much data as possible about the actual spectrum use in order to assess the possibility to also use this band for a new or growing service (e.g. by sharing, re-farming, vacation) or to better exploit the band by the same service/application.

GSMA is of the opinion that for each service/application it will be necessary to assess the significance and the efficiency of a certain use by checking different parameters.

For the significance of a certain spectrum use, parameters like

- the economical or market impact,
 - the social need or
 - special needs like governmental uses or services which are enforced to use certain parts of the spectrum which are dictated by nature
- need to be investigated.

For the efficiency of a certain spectrum use, parameters like



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- the technical spectrum efficiency,
 - possible alternatives or substitutes for transmission (other bands or media),
 - the user acceptance (number of subscribers) and
 - the employed technology (most efficient technology used / alternatives?)
- need to be checked.

4. CONCRETE ISSUES

1. GSMA supports that the review should rely as much as possible on existing tools and procedures (e.g. from CEPT and NRAs).
2. Section IV – User groups mentioned in the draft (page 9/10):
Different user groups may use the same services. It is not excluded that the different user groups will give conflicting responses regarding the same service.
How will this case be treated?
3. Section IV – responsible entities representing stakeholders (page 10)
It is not quite clear why the EC is mentioned in the “Electronic Communications” line.
4. Annex 1 – Harmonised ECS bands (page 22)
Only mobile service bands are listed in the table. However, electronic communications services include also other services, e. g. broadcasting. This is correctly reflected on page 5, 7th line: “...electronic communications (telecommunications and broadcasting, terrestrial and space) ...”. The purpose of this table is not quite clear.
GSMA would like to stress that there is no need for a special consideration of the mobile service regarding the efficiency of spectrum use. All services need to prove an efficient use of spectrum.