

Brussels, 10 January 2012

DIGITALEUROPE response to RSPG PUBLIC CONSULTATION ON REVIEW OF SPECTRUM USE

1 SCOPE AND PURPOSE OF THE DOCUMENT

DIGITALEUROPE would like to thank the Radio Spectrum Policy Group (RSPG) for giving stakeholders the opportunity to comment on their opinion on the review of spectrum use. The RPSG opinion addresses the very important aspect of an inventory of existing uses of spectrum in the EU which was laid out in the multiannual Radio Spectrum Policy Programme (RSPP). DIGITALEUROPE believes that a thorough review of spectrum is very important in fulfilling the objectives of the EC Digital Agenda for Europe.

2 DISCUSSION

DIGITALEUROPE understands that the inventory of spectrum that is outlined in the RSPP is only one component of the spectrum review as envisioned by the RSPG. We address our comments on the complete spectrum review process elaborated in the opinion and structure it in a similar format for ease of reading.

2.1 Assessing the demand for spectrum

We have recent experience from the ITU-R studies predating the World Radio Conference 2007 that spectrum demand is difficult to assess. Only five years ago the ITU-R estimated in its report M.2072 the demand for mobile data globally with low and high ranges for the forecast. In practice, the actual traffic has kept growing much more quickly than that forecast due to extensive mobile broadband use with new device categories (smartphones, dongles, tablets) and new usage trends. Mapping the mobile broadband traffic demand figures into spectrum requirements introduces further challenges when the spectral efficiency estimates set at radio interface technology level tend to overshoot reality and the traffic demand forecast is underestimated.

The mobile industry has been doing market estimates for several years and is continuously updating them¹, so this gives a good understanding of the urgent need for more capacity for mobile broadband. Also several countries in Europe and globally have issued national Mobile

¹ Draft new ITU-R report M.2243 "Assessment of the global mobile broadband deployments and forecasts for IMT", 2011

Broadband plans looking for more spectrum in the order of 500 MHz for mobile broadband.² Related to RLAN/Wi-Fi markets, fixed traffic over Wi-Fi will grow at a CAGR of 35% in Europe between 2010 and 2015. In 2011, it surpassed wired traffic for the first time and by 2015 Wi-Fi traffic will account for 53.8% of all IP traffic.³ That means that the majority of fixed connections in Europe will utilise Wi-Fi at the edge. This is showing how complex is the overall assessment process since diverting some broadcast services to fixed network as suggested⁴ may finally end up with an increase on the wireless demand in other part of the spectrum. To reach Europe's broadband targets and to cope with the growth of traffic, also Wi-Fi is evolving. Stakeholders working in IEEE are well aware of this fact and are moving into the gigabits per second (Gbps) era via 802.11ac. The new standard requires broader channels of up to 160 MHz and ETSI published the revision of the 5 GHz Harmonised Standard EN 301 893, which accommodates these wider channels. To keep pace with demand and accommodate the evolving Wi-Fi technology, sufficient spectrum resources for Wi-Fi need to be found. This is particularly important in the light that consumers are capable of switching between mobile and Wi-Fi for their data networking needs whenever a device supports these both.

We encourage similar, detailed studies for other commercial and public spectrum use, too, whilst understanding that there are concerns such as confidentiality that the RSPG raises in the report.

2.2 Quantifying the supply of spectrum

DIGITALEUROPE believes that when quantifying the supply of spectrum in the EU it is of crucial importance to get the stakeholders, particularly incumbent spectrum rights holders active in the process. As the RSPG opinion points out, currently e.g. EFIS has no detailed information regarding actual use of a spectrum band. Information on licenses as such provides no detail on use, and those spectrum bands that have no licenses at all (general authorisation or statutory use) provide even less information without engaging with stakeholders. We understand the challenges in the amount of data collected and the costs and man power requirements should a very thorough review to be done. Nevertheless, one could also raise a genuine concern that without sufficient commitment and resources the effectiveness and usefulness of the review could be compromised.

The RPSG opinion does raise up the problem of disparate inventories in Member States in section VIII. DIGITALEUROPE sees the overall approach of harmonised use of spectrum across Europe very important regardless of the radio communication service in question. Thus, the opportunity to gain access to under-utilised spectrum in one or two member states is not nearly as big an opportunity than as that presented by access to under-utilised spectrum in several member states. The European Commission assistance in order to get a

² Annex 6 of Draft new ITU-R report M.2243 "Assessment of the global mobile broadband deployments and forecasts for IMT", 2011

³ Source: Cisco Visual Networking Index, 2011

⁴ ITU-R SM.2012-3(2010) Economic aspects of spectrum management

consolidated view of spectrum use opportunities leading towards harmonisation is crucial here.

2.3 Reviewing efficiencies

DIGITALEUROPE welcomes the RSPG thought of considering spectrum sharing under Licensed Shared Access (LSA) as a part of the spectrum review. Whenever very disparate radio communication services are compared on the grounds of economic, social and functional efficiencies, satisfactory conclusions are very difficult to arrive at. Instead of being unable to change the status quo due to conflicting views on the respective importance of different services, LSA widens the opportunities of finding common ground.

3 CONCLUSIONS

DIGITALEUROPE reviewed the RSPG opinion on review of spectrum use and makes the following recommendations:

- It is important to carefully review the usage efficiency of all spectrum bands (governmental or commercial use) in Europe
- There is an urgent need to find more spectrum for IMT/Mobile Broadband
- There is a need to extend the allocation at 5 GHz to foster RLAN development
- The EU inventory shall not delay the on-going harmonisation work that CEPT is currently undertaking on a number of bands where wireless broadband can be deployed in the short term. Any delay will be detrimental to the industry in Europe.

ABOUT DIGITALEUROPE

DIGITALEUROPE is the voice of the European digital economy including information and communication technologies and consumer electronics. DIGITALEUROPE is dedicated to improving the business environment for the European digital technology industry and to promoting our sector's contribution to economic growth and social progress in the European Union.

DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 60 global corporations and 37 national trade associations from across Europe. In total, 10,000 companies employing two million citizens and generating €1 trillion in revenues. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

THE MEMBERSHIP OF DIGITALEUROPE

COMPANY MEMBERS:

Acer, Alcatel-Lucent, AMD, APC by Schneider Electric, Apple, Bang & Olufsen, BenQ, Bose, Brother, Buffalo, Canon, Cassidian, Cisco, Corning, Dassault Systems, Dell, Epson, Ericsson, Fujitsu, Hitachi, HP, Huawei, IBM, Ingram Micro, Intel, JVC, Kenwood, Kodak, Konica Minolta, Lexmark, LG, Loewe, Microsoft, Mitsubishi, Motorola Mobility, Motorola Solutions, NEC, Nokia, Nokia Siemens Networks, Océ, Oki, Oracle, Panasonic, Philips, Pioneer, Qualcomm, Research In Motion, Ricoh International, Samsung, Sanyo, SAP, Sharp, Siemens, Sony, Sony Ericsson, Swatch Group, Technicolor, Texas Instruments, Toshiba, Xerox, ZTE Corporation.

NATIONAL TRADE ASSOCIATIONS:

Austria: FEEL; **Belgium:** AGORIA; **Bulgaria:** BAIT; **Cyprus:** CITEA; **Czech Republic:** ASE; **Denmark:** DI ITEK, IT-BRANCHEN; **Estonia:** ITL; **Finland:** FFTI; **France:** SIMAVELEC; **Germany:** BITKOM, ZVEI; **Greece:** SEPE; **Hungary:** IVSZ; **Ireland:** ICT IRELAND; **Italy:** ANITEC, **Lithuania:** INFOBALT; **Netherlands:** ICT OFFICE, FIAR; **Poland:** KIGEIT, PIIT; **Portugal:** AGEFE, APDC; **Romania:** APDETIC; **Slovakia:** ITAS; **Slovenia:** GZS; **Spain:** AETIC, ASIMELEC; **Sweden:** IT&TELEKOMFÖRETAGEN; **United Kingdom:** INTELLECT; **Belarus:** INFOPARK; **Norway:** ABELIA, IKT NORGE; **Switzerland:** SWICO; **Turkey:** ECID, TESID, TÜBISAD; **Ukraine:** IT UKRAINE