

Response to the Public consultation on the Draft RSPG opinion on the role of radio spectrum policy to help combat climate change

Context

In France and under normal (pre-COVID 19) circumstances, SNCF operates a network of 30 000 km of rail with a traffic of 15 000 trains per day (including high speed trains at 320 km/h) carrying 5 million passengers per day. At every stage of the pandemics, SNCF is working with State and regional authorities to ensure safe continuity of the mobility services essential to the economy (commuter travel and transport of essential goods), and accompany business and passenger travel recovery.

Over the long term, the Group's objective is unchanged: become a world-class champion of sustainable mobility for passengers and freight by 2030, with rail as its core business and France as its touchstone country.

Regarding the combat against climate change and following the [European Green Deal](#) objectives to cut by 55% greenhouse gas emissions, SNCF is a committed stakeholder with [published targets and validated action plans](#). Moreover, we operate in the sector of Public Transport where the positive environmental role of railway and urban rail is recognized, as demonstrated for instance in a [March 2021 report](#) by the European Environment Agency comparing different modes of transportation.

Access to spectrum is identified as a vital input for SNCF as we operate or are deploying dedicated radio networks specifically designed for Control & command (currently GSM-R and in the future FRMCS) and for automated urban rail optimization (CBTC NEXTEO under deployment in Ile de France), as well as PMR based systems (currently Tetra and evolving to 4G and 5G). We are also exploring use cases based on 5G and other innovative technologies.

Comment

RSPG has included in Report RSPG21-026 a section on public transport which rightly points out the positive role of the railway and urban rail sectors in the reduction of carbon emissions. RSPG emphasizes in this section the important spectrum harmonization work for Urban rail ITS and FRMCS, together with other spectrum harmonization elements relevant to our sector.

As a follow-up to the Report, RSPG has recommended in Rec 15 of the draft Opinion "to ensure the availability of spectrum for public transport purposes, as appropriate".

SNCF welcomes this recommendation as being fully warranted for the reasons stated in the context above.