



ecta RESPONSE

**TO THE PUBLIC CONSULTATIONS BY THE
RADIO SPECTRUM POLICY GROUP
ON**

**DRAFT RSPG OPINION ON THE ROLE OF RADIO SPECTRUM POLICY TO
HELP COMBAT CLIMATE CHANGE – RSPG21-027 FINAL**

24 AUGUST 2021

Introduction

1. **ecta**, the **European competitive telecommunications association**,¹ welcomes the opportunity to comment on the Radio Spectrum Policy Group (hereafter 'RSPG') consultation on a draft RSPG Opinion on the role of radio spectrum policy to help combat climate change – RSPG21-027 FINAL.
2. **ecta** represents those alternative operators who, relying on the pro-competitive EU legal framework that has created a free market for electronic communications, have helped overcome national monopolies to give EU citizens, businesses and public administrations quality and choice at affordable prices. **ecta** represents at large those operators who are driving the development of an accessible Gigabit society, who represent significant investments in fixed, mobile and fixed wireless access networks that qualify as Very High Capacity Networks and who demonstrate unique innovation capabilities. **ecta** counts Mobile Network Operators (hereafter 'MNOs'), Fixed Wireless Access operators (hereafter 'FWA operators') as well as Mobile Virtual Network Operators (hereafter 'MVNOs') among its members.
3. Since the beginning of the pandemic crisis, **ecta** members are 'all hands on deck' taking care of the networks and their users. Competitive telecommunications operators hugely contribute to network resilience and redundancy to assure service continuity not only for citizens and enterprises - large and small - but also ensuring resilient connectivity to the data centers and for those on the front line, the health actors.
4. **ecta** is on record as supporting the European Green Deal. In the context of the fight against climate change, many **ecta** members have developed detailed programmes, specific investment plans, and have entered into public commitments to achieve carbon neutrality. **ecta** members also contribute actively to the digital transformation of businesses and public administrations, enabling the 'greening' of other sectors of the economy, including through their activities regarding the Internet of Things (IoT).
5. In light of the massive ongoing digitization effort, for all sectors of the EU economy and society, looking *ECS wireless operators* on a stand-alone basis in the context of climate policy does not make sense. One has to look at the positive contribution that *ECS wireless operators* (as well as ECS fixed network operators and MVNOs) will bring to all other sectors (including the public sector).

¹ <https://www.ectaportal.com/about-ecta>

1. Methodologies to assess the impact of ECS wireless technologies on climate change

6. Whilst broadly agreeing with [Element 1](#) identified by the RSPG under this heading, including the promotion of methodologies to assess the impact of *ECS wireless technologies* on climate change (including a focus on *ECS radio components (base stations and user terminals)*), [ecta](#) considers that a clear distinction needs to be made, throughout the RSPG's draft Opinion, between *ECS wireless technologies* on the one hand, and *ECS wireless operators* (or *ECS network operators*, which is also a term employed in the draft) on the other hand.

[ecta](#) is concerned that the way in which the draft RSPG Opinion is formulated could lead to imposing an additional layer of administrative burden specific to Mobile Network Operators and Fixed Wireless Access Operators, potentially extending obligations on such operators over and above horizontal measures that may be adopted for all industries.

7. A focus on terminal equipment and other equipment located at end-user premises is clearly relevant. Such equipment is responsible for the bulk of greenhouse gas emissions, compared to much more modest numbers for networks and data centers.
8. According to a 2020 Report of the French Senate (information mission on the environmental footprint of digital technology²), terminal equipment accounts for 81% of the greenhouse gas emissions from digital technology at this time, whereas networks (fixed and wireless) account for 5%, and data centres account for 14%. The Report usefully clarifies that the environmental impact of *producing terminal equipment* is far greater than that of the *use of terminal equipment*.
9. Nevertheless, the *use of terminal equipment* is relevant in its own right. Some equipment located at end-user premises (e.g. set-top boxes, printers) is configured to avoid fully powering off, or by internalizing the power supply or power cord. This should change to allow the easy unplugging overnight or the installation of a timer on the electrical outlet.
10. There are potentially further reasons to address the *use of terminal equipment*, e.g. video streaming at 4K and 8K resolution to handheld and other small devices, which does not improve the user experience in practice compared to FHD resolution. This causes far greater bandwidth consumption, forcing operators to dimension their networks to a larger scale (larger dimensioning of core network and RAN

² Rapport d'information n° 555 (2019-2020) de MM. Guillaume CHEVROLLIER et Jean-Michel HOULLEGATTE, fait au nom de la commission de l'aménagement du territoire et du développement durable, déposé le 24 juin 2020: http://www.senat.fr/rap/r19-555/r19-555_mono.html

equipment, more equipment at more locations), and thus potentially leading to a larger than needed environmental impact.

11. [ecta](#) agrees with [Element 2](#) (taking into account energy efficiency and other climate aspects when funding research within the wireless sector, such as for 6G) and with [Element 3](#) (national and EU strategies within the ICT sector).

2. Use of environmentally friendly energy sources and self-regulation

12. [ecta](#) wholeheartedly agrees with [Elements 4 to 7](#) contained in this section of the RSPG's consultation document.
13. We particularly welcome [Element 5](#), and the focus on self-regulation and other voluntary initiatives of the wireless ECS sector to incentivise an increased percentage share of electricity coming from environmentally friendly energy sources including renewable energy sources. As is indicated in paragraph 4 above, [ecta](#) members have already achieved this, or have already committed to achieving this, on a voluntary basis.
14. With regard to [Element 7](#), [ecta](#) agrees that if Member States or EU institutions were to enhance voluntary initiatives and self-regulatory measures, such actions should follow the criteria for all regulatory actions such as non-discrimination, fact-based analysis, and using the most efficient measure from an overall societal point of view. [ecta](#) also explicitly welcomes and supports the RSPG's proposed Opinion that the principle of service and technology neutrality should underpin any measure, and any such measure should be general rather than specific. This is in line with the points we have made in the introduction of this response, and in [ecta's](#) response to RSPG21-014 FINAL.

3. Harmonised spectrum for purposes related to combating climate change

15. [ecta](#) agrees with the elements contained in this section, and lends its particular support to [Element 10](#), which is that any further request for spectrum harmonization should be addressed within the current mechanisms in place. This will ensure that expert assessment remains at the core of spectrum policy, preceding the political decision-making stage.
16. [Element 14](#) appears well-intended, and [ecta](#) agrees that perceived spectrum needs and requests from sectors other than ECS, in the context of their efforts to reduce emissions, need to be treated with caution. [ecta](#) suggests clarifying the wording (perhaps as we have summarized it in the preceding sentence), and to either elaborate on, or to delete, the last part of the sentence, which reads: "*because*

existing processes may already have been triggered". This would help to sharpen the RSPG Opinion, and make it more readily understandable for policy-makers and stakeholders, within the RSPG community and outside the RSPG community.

4. Further considerations, spectrum for weather forecasting, monitoring climate change and gathering long-term climate related data, and 5.6 GHz meteorological climate monitoring systems

17. **ecta** has no comments on the three sections covering [Elements 15 through 22](#), as these are mostly concern matters outside the realm of ECS.

5. Wireless ECS: Spectrum management actions and the EECC framework

18. **ecta** supports most of the elements contained in this section, but with important caveats, expressed below, on [Elements 24, 26 and 28](#).
19. With regard to [Element 24](#), **ecta** agrees and posits that it is well established that MNOs able to rely on wide contiguous blocks of spectrum and deploying 5G New Radio (5G NR), are expected to achieve better energy performance than has hitherto been possible. Therefore, wide contiguous blocks available for all MNOs, and rapid evolution towards 5G NR, are to be welcomed.

However, there is an acute need to be mindful of the need to preserve and promote competition. **ecta** has observed that some EU Member States have carried out spectrum assignment procedures where only 2 or 3 out of 4 (or 5) MNOs (or candidate MNOs) were able to secure large contiguous blocks in the 3400-3800 MHz range, for example 100+100+100+0 (BG), 90+90+70+50 (DE), 80+80+20+20 (IT). **ecta** considers such procedures and outcomes highly problematic.

Local licensing for so-called 'verticals' (e.g. industrial sites, ports campuses, etc.) can jeopardize the availability of large contiguous blocks of spectrum for MNOs, especially in mid bands. Challenger MNOs and MVNOs are well placed to work in close collaboration with industrial and government users to define new B2B and B2B2C solutions, including through network slicing, and by means of the Internet of Things. This is necessary to break the stranglehold of incumbent telecommunications operators on the markets for services to businesses and public administrations. Therefore, local licensing should not be adopted in the primary low and mid bands for 5G, or at least large portions of those bands should not be reserved on a nation-wide basis for local licensing, because it would leave a lot of evidently useful spectrum unused in practice. If local licensing is considered needed, doing so in millimeter wave bands may be more appropriate.

20. As far as [Element 26](#) is concerned, [ecta](#) takes note of the RSPG's proposal that: *"Member States should assess how active or passive infrastructure sharing may help reduce the carbon footprint of wireless ECS while maintaining competition objectives, and that, based on these assessments, Member States should consider enabling infrastructure sharing among operators"*.

While cautiously welcoming these points in principle, [ecta](#) emphasises that pro-competitive safeguards are needed related to all forms of spectrum and infrastructure sharing.

This is necessary to avoid that benefits from sharing only accrue to one or two of the largest MNOs, to companies controlled or closely associated with the State, or to giant companies seeking to extend license-exempt spectrum or encroach on licensed spectrum in order to compete with licensees who paid large one-off and recurring fees for rights of use over spectrum.

For extensive further detail, notably expressing concerns and requirements surrounding spectrum sharing, please refer to [ecta's](#) combined response of 26 March 2021 to RSPG21-014 FINAL, RSPG21-006/016 FINAL and RSPG21-008 FINAL.

21. Finally, with regard to [Element 28](#) in which the RSPG discusses the possibility that *ECS network operators* could be required to report on their emissions and the actions they are taking to achieve the Union's environmental targets, and possible legal measures in respect of such reporting, we re-emphasise the points made in paragraph 6 above, i.e.:

[ecta](#) is not convinced that *ECS wireless operators* (or *ECS network operators*, which is the terminology used in [Element 28](#)) should be subject to specific reporting and other obligations. [ecta](#) is concerned that this could impose an additional layer of administrative burden specific to Mobile Network Operators and Fixed Wireless Access Operators, potentially extending obligations on such operators over and above horizontal measures that may be adopted for all industries.

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For further information, clarification or discussion, please contact Mr. Luc Hindryckx, [ecta](#) Director General.