

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

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Source: Ministry of Industry and Trade of the Czech Republic (in cooperation with the Czech Telecommunication Office)

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To: RSPG Secretariat (cnect-RSPG@ec.europa.eu)

The Czech Republic welcomes the opportunity to provide feedback to the consultation on the Draft RSPG Opinion on the role of radio spectrum policy to help combat climate change.

We welcome the work item to identify the role of spectrum policy to identify measures to combat global climate change and to assess how it could contribute to broader environmental goals involving various kinds of radio spectrum usage as a crucial component.

We would like to **propose the following improvements** to the draft Opinion:

Comment #1:

We are of the view, that any actions or steps in the ways of spectrum usage or spectrum management shall be based on facts and evidence, as a matter of methodology. In Paragraph 7, we noticed a clause dealing with this issue. However, as an important issue, we propose to highlight the principle of the evidence-based regulation in the methodology part too, as follows:

Section Methodologies:

New Paragraph 3-bis): When considering EU-wide strategy on ICT and climate change, RSPG invites the European Commission to take into account the principle of an evidence-based approach.

Comment #2:

Going through the corresponding RSPG Climate change report, we found no evidence nor consequence of the roll-out of indoor small cells and its possible contribution to combatting climate change. Instead, within the regulatory framework (incl. EECC), the governments and NRAs are tasked to make efforts towards the rollouts of electronic communications networks in general (indoors, outdoors, in trains etc.). Therefore, **we propose to delete Paragraph 27.**

Comment #3: recommendation on smart grids

We understand, that the draft RPSG Opinion on climate change is primarily based on optimisation of energy consumption, including efficient energy distribution. Therefore, we welcome Paragraph 16, dealing with the role of smart grids. In Europe, we notice the need for private networks (incl. 5G) intended to provide the guaranteed access and the resilience essential for Smart Grids. We propose **to highlight the importance of Smart grid** solutions within Paragraph 16, or within other parts of the Opinion, as appropriate.