

ETNO comments on the Draft RSPG Opinion on a long-term strategy on the future use of the UHF band (470-790 MHz) in the European Union



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Executive Summary

ETNO welcomes the opportunity to comment on the draft RSPG opinion on a long-term strategy on the future use of the UHF band (470-790 MHz) in the European Union.

It is more and more evident that mobile broadband networks need new capacity. To achieve this goal, telecom operators need new spectrum resources to be allocated to mobile service and identified for IMT applications in the near future.

Therefore ETNO shares the idea expressed in the draft RSPG opinion that the 694-790 MHz band (the 700 MHz band) should be cleared from the broadcasting applications and identified for IMT applications by 2020.

Moreover, Member States should have the flexibility for an earlier start in this process, provided that the cross border coordination with neighbouring countries has been concluded.

Finally, ETNO firmly believes that a mobile co-primary allocation of the 470-694 MHz band in Region 1 should occur at the WRC-15.

Introduction

ETNO welcomes the Radio Spectrum Policy Group invitation to express comments and views in relation to the draft RSPG Opinion on a long-term strategy on the future use of the UHF band (470-790 MHz) in the European Union.

As the association of the leading European telecom network operators we have always recognized the importance of a common European spectrum policy aimed at improving the quality of European citizens' life.

The following are ETNO comments related to the draft opinion.

ETNO Comments

700 MHz roadmap

It is more and more evident that mobile broadband networks need new capacity. Last generation devices (smartphones, tablets, dongles, consoles) and new applications available on the market are congesting the existing networks. To alleviate this situation telecom operators need new spectrum resources to be allocated to mobile service and identified for IMT applications in the near future.

Therefore ETNO shares the idea expressed in the draft RSPG opinion that the 694-790 MHz band (the 700 MHz band) should be cleared from the broadcasting applications and identified for IMT applications by 2020.

To get to this target, ETNO also agrees with the RSPG that the review of the RSPG should include a harmonised roadmap to be followed within the EU defining the harmonization conditions for the transition.

Nevertheless ETNO is of the opinion that, although identifying 2020 as the target date for a complete implementation of wireless broadband networks, Member States should have the flexibility for an earlier start, provided that the cross border coordination with neighbouring countries has been concluded.

Cross-border coordination

ETNO is welcoming the attempt of the RSPG opinion to set a date for the completion of the cross-border coordination, and that this date should be fixed around the end of 2017.

The activities between stakeholders and neighbouring countries should be supervised and coordinated by the RSPG, EC and CEPT in order to facilitate all Member States meeting the final deadline.

Cross-border negotiations, as well as negotiations with non-EU neighbouring countries should start in a timely manner to ensure that all necessary cross-border coordination agreements will be finalized in time for the starting date of the process of assigning the 700 MHz band to the ECS services.

Long Term Strategy for the 470-694 MHz band

There is a broad ongoing discussion on the future use of the UHF band (470-694 MHz) among all stakeholders. ETNO is following the debate on a possible convergence between mobile broadband and broadcasting service in the mid/long term with great interest. We are also participating in several initiatives on the topic and therefore we

welcome any activity leading to the development of a long-term strategy on the future of this band.

ETNO understands that there's not a clear vision yet and assumes that such a convergence is not likely to happen very soon.

Nevertheless, as also expressed in the reply to the draft RSPG opinion on WRC15, ETNO firmly believes that a mobile co-primary allocation of the 470-694 MHz band in Region 1 should occur at the WRC-15. We believe that this is a necessary prerequisite for a sound reflection on the future of that band.