

Dear Sir,

Please find in attachment our inputs w.r.t to your request for comments to the following 2 draft opinions issued by the RSPG;

#### **Comments to RSPG Draft Opinion on Common Policy Objectives for WRC15**

- *“1. ...to develop and adopt an RSPG opinion for each WRC, proposing to the European Parliament, the EU Council and the European Commission “Common Policy objectives” for the corresponding conference, to be adopted in time for the CPM (i.e. 9 months before WRC);”*

The statement is valid but the timing is inappropriate with WRC15 timeline ( The CPM-2 is close to its final stage). We recommend a situation similar to that of ICAO, i.e to define a position for each A.I in the year following the end of a WRC.

- *‘1. ... Where a potential for conflict of interest between differing groups of stakeholders arises, the Commission should provide guidance on European priorities in regard to those WRC Agenda Items relevant to the EU. This guidance should be based on an evaluation of social and economic consequences which should be undertaken in parallel with the compatibility analysis conducted by CEPT. The assessment of the social and economic impacts for all stakeholders should be discussed with Member States through RSPG”*

The statement is valid with the caveat that the social and economic impacts for Civil Aviation have not been studied for WRC15, furthermore Aviation interests as a major Spectrum stakeholder are not represented at RSPG level .

- *‘1. ...During the conferences, Member States should make their best efforts to coordinate the evolution of European Common Proposals (ECPs) in line with EU and CEPT policy objectives and to find a balanced compromise on all WRC Agenda Items taking into account the relevant policy objectives ‘*

There should be a clarification that the European Common Proposals cover the common positions of CEPT members (48 states) , much broader than the EU membership, hence not equal to EU Common Proposals.

- **4. Main themes with relevance to EU policies**

*The RSPG is of the opinion that the following areas of EU policy are most relevant to the specific Agenda Items at WRC-15....*

In this chapter, one to one links are made between WRC15 AI's and specific EU Common Policies (Information Society, Space, Transport, Science..)

For instance, AI 1.1 and 1.2 touching on L and C bands are of prime importance for Aviation but it is only referred to the EU Information Society for the definition of the elements of a common policy objective. The result is that you forget to mention in the 5GHz band systems like MLS, RPAS, AeroMACS, Aero telemetry

The same applies with AI 1.6 and 1.7 referring only to the Space policy.

Actually the only items under consideration for the Transport Policy is AI 1.5, 1.15, 1.16, 1.17 and 1.18.

We believe that a number of key AI's that you should be linked to Transport policy as well are missing, and that an objective list should be the one for which ICAO and EUROCONTROL/ASFCG has defined a WRC15 position.

Please note that DG Connect is a member of ASFCG and has access to all relevant documents.

We understand that the various EU Policies/sector might/will lead to contradicting positions for specific AI's and that a proper recommendation would be to coordinate these policies prior to the definition of common policy objectives per AI. Hence we insist on the fact that priority shall be given on protection of safety of life spectrum.

- **4.4 Future WRC Agenda Items, WRC-15 Agenda Item 10**
- *The formulation of positions for future WRC Agenda Items is a critical issue since it may determine the scope of changes to the global spectrum management environment for several decades. It will be important to identify, as soon as possible, opportunities to promote European policies through action at future WRCs with the objective to promote European arrangements at a global level.*
- *It will also be necessary to identify potential Agenda Items for future conferences early in the process, taking into account both the need to ensure long term consistency with EU policy and the possible connection to common policy objectives for WRC-15 Agenda Items.*
- **Elements for a common policy objective:**
- **Member States should support a future Agenda item addressing the spectrum needs for the fifth generation of mobile networks (commonly known as 5G) with the focus above 6 GHz.**

Again , we believe that you are under-estimating the importance of the future WRC Agenda items that should be the key access point for all EU policies dealing with RF Spectrum , and not only as stated here, the introduction of the 5G technology.

#### **Comments on the Draft RSPG Opinion on a long-term strategy for the use of the UHF band (470-790MHz) in the European Union**

After the World Radiocommunication Conference 2015 (WRC-15), the 694.5-790 MHz ("700 MHz") frequency band will be effectively allocated on co-primary basis to the mobile service alongside the broadcasting service. Whereas in the EU this band is primarily used for digital terrestrial television, it has already been licensed for wireless broadband (WBB) in several Asian and American countries and is planned for use by WBB in large parts of the world. Like the 800 MHz band, it provides good coverage both indoor and outdoor and is therefore considered an attractive candidate band for WBB (See RSPG Opinion on WBB).

In its opinion on WBB, adopted in June 2013, RSPG identified issues in relation to the 700 MHz band and published issues related to broadcasting in an additional

report. The need to explore the impact on existing usage of spectrum, including PMSE, was mentioned, noting that the long term spectrum need for broadcasting varies among Member States.

Within the overview of the current use of the 470-790 MHz band, and in addition to broadcast, PMSE and radio astronomy, other aeronautical radiocom services are used as follows:

- Wind profilers in the 470-494 Mhz, radiolocation on a secondary basis in accordance with ITU Resolution 217
- Aeronautical radionavigation in Bulgaria, Hungary, Poland, Slovakia, The Czech republic, Romania (EU countries) + number of EUROCONTROL member states not part of EU in the band 645-862 MHz on a primary basis

We are concerned that with the *Chapter 7, Elements for the long term strategy*, RSPG mentions only the Wind profiler Radiolocation service as an aeronautical service to be retained in the future.

This concern is re-inforced during the reading of chapter 7.3.1 *Description of Options for the band 470-694 Mhz and chapter 8 Migration issues* which are not debating the aeronautical radionavigation services issue. Again, we would like that within Chapter 7.3.1, elements like compatibility studies and interference issues are taken onboard specifically for out-of-band harmonics interfering with the L band systems.

*Within Chapter 9, The Opinion of the RSPG*, the PMSE issue is well addressed but not the other services using the band.

Ps: Could we get the results of the Plum Consulting and Farncombe study on the impact of future options for the delivery of audio-visual and data services on use of UHF spectrum (470-790 MHz) and possibly further sub-1 GHz spectrum.

With my best regards,

Sven Fraenkel

EUROCONTROL

Spectrum Management

DPS/POL Unit

---

**Sven Fraenkel**

Spectrum Management

DPS/POL Unit

Tel: +32 2 729 3538

[sven.fraenkel@eurocontrol.int](mailto:sven.fraenkel@eurocontrol.int)

**EUROCONTROL**  
96 Rue de la Fusée  
1130 Brussels  
BELGIUM  
[www.eurocontrol.int](http://www.eurocontrol.int)