

Public Consultation on the Draft RSPG Report on 6G Strategic vision

EOLO S.p.A.

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About EOLO

EOLO is the Benefit Company operating in the telecommunications sector at national level with the mission of connecting small municipalities and rural areas to ultra-broadband services. Today EOLO is the first FWA operator in Italy for the residential and business market with 691.000 customers (Source: Agcom).

The EOLO network is active in more than 6,900 municipalities thanks to 4.100 BTS and more than 17,000km of fibre optic backbones.

This commitment to inclusive digitisation of the country has also been recognised through the B Corp certification received in January 2023. EOLO is the first telecommunications operator to become a B Corp in Italy.

For more information, visit www.eolo.it

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EOLO welcomes the opportunity to provide feedback on “6G Strategic vision” Draft RSPG Report.

Below we provide overall input limited to the most relevant issues in consideration of the experience of the company as Fixed Wireless Access operator based in Italy.

5G development and lessons learnt

RSPG states that the millimetre-wave band 26 GHz is still under an early deployment phase. In addition, the report points out that the availability of mobile terminals and equipment in the 26 GHz and 42 GHz band remains limited and costly, as the necessary ecosystem is still in development.

EOLO considers it useful to point out that the above should be considered as referring only to mobile services and not to FWA services. EOLO agrees with RSPG on the evidence that compared to the other bands, the 26 GHz band still needs time to be fully exploited through the implementation of 5G services but, at the same time, it would like to mention that regarding fixed services, the market is now mature.

Specifically, it is announced that using 26 GHz frequencies, EOLO is engaged in the deployment of the first 5G standalone mmWave network in Italy to provide high quality connectivity - up to 1 Gbps - to the whole Italian market where fiber investments are not sustainable.

Locals and verticals

EOLO takes note that according to RSPG there will be an increase of the need for local spectrum and that early forms of spectrum utilisation by verticals are developing at the European level.

As of today, however, we do not perceive that there has been any significant change in this regard from previous analyses. In Italy for example, the demand for connectivity by the verticals does not seem to undergo significant changes.

It is therefore considered appropriate that the choice of allocating dedicated spectrum for such uses should be left to member states and, above all, should be evaluated on a case-by-case basis, also taking into consideration the needs of operators already using the bands that would be dedicated to verticals.

Early policy initiatives on 6G

EOLO fully agrees that a long-term strategic spectrum strategy is needed to be ready for the next generation of communications, 6G. In order to stimulate the market in time, both from the demand and supply side, it is necessary to intervene early to define the “new rules of the game”.

However, in order to give certainty to operators and confidence with respect to the return on the large investments they are still making for the deployment of 5G networks, **it should be made clear now that the allocation of spectrum for 6G uses will not be to the detriment of what has been allocated for 5G spectrum so far.** In this regard, the initiatives aimed at studying possible new models of spectrum sharing or joint evolution/interoperability of 5G and 6G are certainly appreciable.

Lessons learned about 5G should be taken into account when defining the 6G roadmap. Specifically, it was observed that most of the smart objects and services announced (such as new pervasive mobile virtual services, urban air mobility (UAM), extended reality (XR), hologram technology, digital twin applications and so on) have not yet materialized as expected, or when expecting, accentuating a significant gap between expectations and reality.

This high expectation regarding new services has been exploited to inflate the prices of frequency auctions. As is well known, in the face of the large investment in frequency allocation, the implementation process has suffered some slowdowns.

To prevent such a situation from occurring again in 6G, there is a need to be very cautious to set policies that are consistent both with market demand, albeit in a medium/long-term forecast perspective, and with the market's ability to invest so to identify plausible scenarios and realistic goals. It is therefore desirable that any new auctions or in general any spectrum allocation policies, focus more on imposing coverage obligations, guaranteeing the widest possible access, in order to avoid a mere hoarding of frequencies which then remain unused. To ensure efficient use of spectral resources it is equally important to provide sharing mechanisms with existing uses (so-called incumbents) so as to ensure continuity of service to users and not displace operators' investments.

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