

Dear Sir/Madam,

GIFAS is the structure that represents and defend the French aerospace sector's interests. Founded in 1908, it is a trade organization comprising 485 members – from major prime contractors and system suppliers to SMEs and startups – covering the full spectrum of skills from the design, development and production of aerospace systems and equipment to maintenance operation.

I would like to thank the Radio Spectrum Policy Group for giving GIFAS the opportunity to provide input to the consultation on the “*Draft RSPG Report on 6G Strategic vision*”, published on the 13 November 2024.

GIFAS considers the WRC-27 agenda item 1.7 as a major threat for military communications, Earth observation as well as for civil aviation. As a result, GIFAS is opposed to any new identification for IMT (6G radio spectrum) in all the frequency bands listed in WRC Agenda Item 1.7. Please find hereafter GIFAS comments prepared by the “*Frequencies committee*” of GIFAS, which gathers the experts on frequencies of GIFAS members.

Please do not hesitate to contact us, should you require any further information.

Best regards,

Sylvain FOUR

Directeur des Affaires européennes et internationales



Groupeement des Industries Françaises Aéronautiques et Spatiales

GIFAS comments to the Draft RSPG Report on 6G Strategic vision

The agenda item 1.7 of the WRC-27 creates major risks for military air and space communications as well as Science and Earth observation data links in several key frequency bands, in particular in the X band. The frequency band 7 125 – 8 400 MHz is of critical importance for a number of military communications (NATO harmonized) and Earth observation satellite systems, e.g.:

- Military satellites communication solutions ensure Member States are always connected and ready for the growing amount of data to be collected and disseminated, on the ground, at sea, in the air and in orbit. These secure, flexible and scalable communications systems enable Member States to exchange critical information with appropriate connectivity, and to preserve individual national sovereign interests.
- Military Earth observation satellites help strengthen Member States' ability to plan and conduct operations. They provide decision-makers with the ability to enhance security, optimise mission planning and operations, improve performance and scale management resources.

Moreover, Earth observation satellites provide authoritative information about the past, present and future climates in Europe ([Copernicus, the Europe's eyes on Earth](#)) and the rest of the World. This data is essential for various applications and domains, including defence, security, agriculture, risk and disaster management, climate change and environmental monitoring and adaptation, urban planning, scientific research, etc. In addition, Earth observation satellites provide critical observation data across several key industries, including aviation, shipping, oil and gas, and transportation.

The introduction of 6G mobile networks in these bands will severely impact, if not prevent, any operations of military equipment and Earth observation satellite systems, yet essential for EU sovereignty, especially considering the current international geopolitical context and during war time.

The bands 4400-4800 MHz and 14.8-15.35 GHz are also NATO harmonized bands utilized in the fixed and mobile services. GIFAS is concerned that an identification under WRC A.I.1.7 will likely limit or degrade the utilisation of NATO systems within and outside nations boundaries.

In many cases, there are currently few or no alternatives to meet the needs of the critical missions which could be affected, whether for lack of available frequencies in other frequency ranges, lack of diversity and/or technological maturity, or for reasons intrinsic to the physical properties of the concerned frequencies.

Furthermore, GIFAS supports the ICAO draft position shared with the ITU (<https://www.itu.int/md/R23-WP5B-C-0202>) on the agenda item 1.7 of the WRC-27:

- To oppose any new identification for IMT in the frequency band 4 400 – 4 800 MHz that reduces the protection of, or imposes additional regulatory or technical constraints, on radio altimeters and Wireless Avionics Intra-Communications operating in the frequency band 4 200 – 4 400 MHz.
- To ensure the results of this agenda item would not reduce the protection of, or impose additional regulatory or technical constraints, on ground-based air traffic surveillance systems, airborne weather radar, and DAA radars, operating in the frequency band 15.4 - 15.7 GHz.

GIFAS considers the WRC-27 agenda item 1.7 as a major threat for the European Aerospace, Security and Defence industry. GIFAS is opposed to any new identification for IMT (6G radio spectrum) in all the frequency bands listed in WRC Agenda Item 1.7.