



**EUROPEAN COMMISSION**

DIRECTORATE-GENERAL FOR COMMUNICATIONS NETWORKS, CONTENT AND TECHNOLOGY

Digital Decade and Connectivity  
**Radio Spectrum Policy Group**  
**RSPG Secretariat**

Brussels, 12 February 2025  
DG CNECT/B4/RSPG Secretariat

**RSPG25-007 FINAL**

**RADIO SPECTRUM POLICY GROUP**

**Progress Report of the RSPG Sub-group  
on Strategic Spectrum Matters**

## Progress Report of the RSPG Sub-group on Strategic Spectrum Matters

The RSPG sub-group on ‘Strategic Spectrum Matters’ established by the European Commission further to the adoption of the RSPG work program is currently engaged in the response to the Request for Opinion on the EU-level policy approach to satellite Direct-to-Device connectivity and related Single Market issues (RSPG24-023).

Members of this sub-group include around 100 representatives from 19 Member States, Norway, Montenegro, Türkiye, Ukraine and the European Commission.

Since the last plenary, the sub-group has met three times: one remotely (27 November 2024) and twice in hybrid format in Brussels in European Commission premises (17 December 2024 and 23 January 2025). In addition to these meetings, a number of calls for comments on the draft Opinion have been held between meetings ensuring a progressive consolidation towards a draft Opinion. Thanks to sub-group members who actively contributed to these meetings and provided comments between the meetings.

**As a result of this process, the sub-group achieved the target of the RSPG Work Program. A draft Opinion is submitted to this plenary for approval for public consultation.**

### 1. Responses to questionnaire

Prior the last RSPG plenary, a questionnaire was circulated to sub-group members addressing both *Authorisation of D2D services in EU Member States* and *Access to EU market*. A large number of replies were received prior to the last Plenary. As agreed during the last plenary meeting, a last call for replies was made on a short time frame.

23 Member States and Island, Liechtenstein, Norway, Switzerland contributed to this process with detailed replies and explanations. Thanks to the sub-group members who contributed to this process.

Responses have been made available to Members of the sub-group on the Circa website.

**Further to consultation and information to the sub-group, it is proposed to make publicly available the replies to this questionnaire on the RSPG circa web site.**

### 2. Working methods

The sub-group has developed the draft Opinion on the basis of responses to the above questionnaire. Replies raised multiple issues, some beyond the scope of this Opinion. The relevant strategic spectrum issues that have been included in this draft Opinion are those that trigger relevant recommendations included in section 4 of the draft Opinion. Issues beyond this draft could be considered as appropriate by EU Member States, the Commission, BEREC or CEPT according to relevant areas of expertise.

The draft Opinion is not addressing how RSPG will organise itself in order to engage on implementation of relevant recommendations, in particular, on access to EU market and when it will be appropriate to address any internal organisational RSPG matter.

The sub-group developed its recommendation on “D2D” and “Access to EU market” on the basis of the current EECC. In particular its Article 30 has been considered during the discussion as the basis to report non-compliance to common requirements. Based on the responses to the public consultation, any strategic high-level recommendations in particular concerning, for example, potential update of EECC could be further developed. It is also assumed that RSPG intends to, when appropriate, further review the EECC and develop relevant concrete proposals to contribute to any need to update the EECC if appropriate.

### **3. Scope of the Opinion**

The draft Opinion includes an overview of satellite Direct-to-Device connectivity issues (section 2) and issues relative to access to national and EU markets (Section 3). Relevant RSPG recommendations on strategic spectrum issues are highlighted in its last part of the draft deliverable (Section 4).

### **4. Informal contact with BEREC**

As mentioned during the last sub-group meetings, informal contact has been already established with BEREC representatives. Informal presentation of the draft Opinion by co rapporteurs to BEREC representatives could be foreseen as appropriate during the public consultation period.

#### **The RSPG plenary is invited to**

- **note the progress of the work**
- **adopt the draft Opinion (RSPG25-008) for public consultation**
- **agree to make all replies to the questionnaire publicly available on the RSPG Circa web site**

Co-chairs:

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