

Draft response to the draft Update of the RSPG Work Programme RSPG WP “2014 and beyond”

Silver Spring Networks welcomes the opportunity to respond to RSPG’s draft Update to the RSPG Work Programme. We also welcome the broad thrust of the document and believe that it sets out a realistic plan for implementing and managing the development of the Radio Spectrum Policy Programme (RSPP).

The work item, *Review of the Radio Spectrum Policy Programme*, intends on, ‘Fostering different modes of spectrum sharing in Europe, to ensure efficient use of spectrum and to increase spectrum access opportunities for wireless innovation’, which we particularly applaud.

Shared access to spectrum can play an important role in maximizing the efficiency with which spectrum is used around Europe. The RSPG is investigating extending these ideas as can be witnessed from the recent consultation on of Licensed Shared Access¹, to which we provided detailed feedback gleaned from our experience of similar techniques around the world.

Cellular operators’ use of managed spectrum is hugely effective, re-use techniques achieving extremely high utilization across rural and urban areas, but these networks are being increasingly used to support high ARPU and high data rate applications, and will become increasingly inappropriate in supporting connection to the billions of endpoints that are anticipated for M2M applications and the Internet of Things.

Lower data rate and lower power applications exploiting licence-exempt bands – notably the 863-870MHz and 2.4GHz bands are boomed over the past fifteen years making a significant contribution to economic and social benefits for European citizens. The use of such bands can also augment the service provided by MNOs by providing network offload.

RSPG would be well advised to draw from the body of work development by regulators and manufacturers in Europe Short Range Device (SRD) community, notably CEPT SE24 and ETSI TG 28, where many of the technical problems that may be faced have already been addressed. Recent work culminating in ECC Report 181 sets out principles for sharing between different types of system without specifying individual applications.

The work items also plans to, ‘[Ensure] that the radio spectrum can be used to support a more efficient energy production and distribution in Europe so that wireless innovations contribute to a low-carbon society, for which license-exempt applications can play a significant role in connecting millions of end points in consumers’ homes and many locations within DSO’s networks. This will make a huge contribution towards the EU’s 20/20/20 goal, and the EC has recognized that *‘European Smart Grids will promote the Intelligent Energy Supply Chain that will optimize, control, secure and sustain the procurement and supply of cleaner distributed energy anticipating increased demand till 2020 and beyond.’*

¹ Draft RSPG opinion on licensed shared access, RSPG13-529 rev1

Many Smart Grid solutions from around the world rely on unlicensed spectrum to achieve the availability and openness of supply to support these types of applications.

Finally, the EC has provided strong support and guidance towards the harmonization of two new bands 870-876MHz and 915-921MHz across Europe. The bands to support will be able to support these and many other applications as has been highlighted in a detailed study carried out by Horovitz and Forge in their response to Ofcom², UK's recent consultation. Technical work towards the release of this spectrum in member states has been completed by CEPT and ETSI and the final ratification of its addition to the relevant CEPT Recommendation document will take place in February of this year, at CEPT WG FM. We would encourage the EC to continue its support for the release of this spectrum in countries around Europe.

² <http://stakeholders.ofcom.org.uk/binaries/consultations/870-915/responses/SCF.pdf>