



Telefónica Group response to consultation on draft RSPG Work Programme "2014 and beyond"

General comments

Telefónica would like to thank the Radio Spectrum Policy Group (RSPG) for giving stakeholders the opportunity to comment on their draft Work Programme for 2014 and beyond. We note that the RSPG Work Programme may need to be amended during 2014/2015 to take into account the outcome of the negotiations on the Telecoms Single Market (TSM) proposals and any ensuing regulation once finalised. We agree that three of the most important topics for work by the RSPG are a long-term strategy on the future of the UHF band, WRC-15 preparation, and the review of the Radio Spectrum Policy Programme (RSPP).

On a general point, Telefónica would welcome the opportunity to comment on all future RSPG deliverables if they are similarly opened up to public consultation. In previous years we note that some of the deliverables of the RSPG have not been open to comment. There is a need for confidence to be maintained in the regulatory approach to spectrum management as the TSM is developed further, and that confidence can be boosted by open and transparent procedures relating to all aspects of the European institutions' work. Early consultation with industry of developing spectrum policy is in the interest of citizens and consumers because it will help quick and seamless adoption of technologies supporting new spectrum opportunities and deployment of new networks and services by mobile network operators.

Long-term Strategy on the Future use of the UHF Band

Telefónica notes that the 700MHz band (694-790MHz) will be discussed under WRC-15 Agenda Item 1.2 and we expect the provisional allocation to the mobile service on a co-primary basis to be confirmed at WRC-15. **We support an EU-level political agreement to reallocate the 700MHz band from DTT to WBB use.** Low frequency bands will continue to be important in the provision of ubiquitous high speed data coverage and will enable new services and innovations to be implemented.

In addition to the work on the long-term strategy on the future use of the UHF band below 694MHz, we note that the RSPG proposes to assess the implementation of WBB in the 700MHz band in the EU during 2014 and beyond. In particular, Telefónica considers that the RSPG may need to use its good offices to assist with the bilateral / multilateral discussion of DTT replanning that is needed in order to ensure a timely migration following a reallocation

decision. We believe that this may be the critical path in many Member States and suggest that this migration should be completed by 1 January 2018.

WRC-15 Preparation

Telefónica agrees that there is a need for the RSPG to build on its Interim Opinion on WRC-15, in order to help formulate common European policy objectives for the Conference next year. As noted above, we expect the provisional allocation of the 700MHz band to the mobile service on a co-primary basis to be confirmed at WRC-15. Telefónica agrees with the RSPG Interim Opinion on Common Policy Objectives for WRC-15 that Agenda Item 1.1 is one of the most significant WRC issues for many years. We note that the RSPG requires the identification of at least 1200MHz of suitable spectrum by 2015 to support growth in wireless data traffic, and that the RSPG Opinion on Wireless BroadBand assessed the possible solutions and options for meeting the future demand for wireless broadband services in the time frame 2013-2020. Telefónica considers that **WRC-15 decisions under Agenda Item 1.1 should take into account future demand for the next 10-15 years** (i.e. through to 2030), since WRC decisions typically take 8-10 years to implement fully.

The Review of the RSPP

The first RSPP was established for the period 2012-2015 and Telefónica agrees that there is a need for the RSPG and BEREC, where appropriate, to work during 2014 and 2015 on such topics as spectrum auction design, incentive methods to ensure efficient usage and innovation, duration and timelines, in order to complete its implementation. We believe that the second RSPP should play a role in the definition of a long term strategy for spectrum (including but not restricted to the UHF band) and that the review of the RSPP should take into account trends and enable next generation wireless services that extend to at least 2025. The trends that Telefónica has seen in recent months with the phenomenal uptake of Mobile BroadBand (MBB) suggest that more spectrum will be required for mobile services, in both high and low frequency bands, as the bandwidth per user increases. A long-term view (10+ years on end user requirements, technologies and markets) is needed. In particular, the focus should be on the economic benefits that different radio services and applications could offer Europe as a whole.

Our customers are demanding an increasingly wide range of services, with a high focus currently on social networks, hyper-connectivity and machine-to-machine communications. Telefónica expects public mobile networks to support increasing numbers of new applications and user groups, including emergency services, security, smart homes, smart energy and so on. In particular, content rich services require a transformation of existing networks from voice enabled communications to high data traffic enabled ones.

In addition to increasing efficiency, Telefónica called in our response to the Commission's consultation on the first RSPP for a review of spectrum allocations between at least 400MHz and 5GHz to ensure that there will be sufficient spectrum allocated to Mobile BroadBand through to at least 2020. We would now like to see this extended through future WRC Agenda items (addressed by WRC-15 Agenda Item 10). In addition, **Telefónica believes that the second RSPP should include a more extensive review of spectrum allocations (i.e. above 5GHz) to ensure that these future service needs can be fulfilled.**