



GSMA Response to the RSPG Consultation on the RSPG Work Programme “2014 and beyond”

6 January 2013

Introduction

The GSMA welcomes the opportunity to respond to the RSPG consultation on its Work Programme “2014 and beyond” and believes that the RSPG has rightly identified the important specific radio spectrum policy issues relating to electronic communications for Europe for 2014 as well as for the near future. Such forward-looking Working Programme is consistent with the strategy and vision that the mobile industry has in Europe.

The GSMA also welcomes that the public consultation on the Working Programme is opened to all relevant stakeholders and we hope that the deliverables of the RSPG for 2014 and beyond will also be subject to formal public consultations.

In addition to the topics already identified by the RSPG in its draft Working Programme, the GSMA would like to suggest a new issue relating to **wireless backhaul**. Indeed, despite the recent increase in spectrum for mobile and future allocation of further bands, data demand is increasing exponentially. Research from Ericsson AB shows that global mobile data traffic grew 80% between the second quarter of 2012 and the third quarter of 2013¹, which means that on average the mobile industry will need about 1600-1800MHz of spectrum by 2020, compared with the 300-500MHz we have today. In order to respond to this growth in demand for capacity on the mobile networks, more harmonised spectrum will be required but also rapid deployment of innovative solutions across Member States. Such innovative solutions include small cells and with their introduction there is an increasingly important role for wireless backhaul. Ideally, these should be deployed in a small number of harmonised pan-European bands in order to be economically viable for mobile operators. Today, technical parameters for fixed links are harmonised (designated bands, channel arrangements by CEPT), but there is a lack of commonality in which bands are used across Member States. These differences

¹ <http://www.ericsson.com/mobility-report>, November 2013



have pushed MNOs in different countries to use many different bands for wireless backhaul in the macro network. Therefore, more coordination across the EU Member States on backhaul would be welcome by the mobile industry to enable significant economies of scale, resulting in lower costs for consumers.

The GSMA also welcomes the identified spectrum policy issue for cooperation with BEREC relating to efficient awards and use of spectrum bands harmonised for Electronic Communications Services. Spectrum management is an area where more harmonization is necessary. The GSMA is supportive of including recommendations and best practices for auction design and licensing as we are of the opinion that some auction rules could be harmonized to maximize economic efficiency and increase transparency, openness and simplicity.

Finally, regarding the review of the Radio Spectrum Policy Programme, the GSMA believes EU level rules could be strengthened on issues like spectrum allocation, re-farming and spectrum trading in order to ensure timely availability of spectrum for mobile broadband across all markets. Indeed, article 6(8) of the RSPD Decision has mandated spectrum trading as envisaged in Article 9(b)(3) of the Framework. A status of the work conducted by Member States in implementing this regime, setting out key experiences could assist in promoting harmonisation and increased coordination across Europe. Accordingly, the GSMA believes the following work streams should be explored by the RSPG in cooperation with BEREC.

About the GSMA

The GSMA represents the interests of mobile operators worldwide. Spanning more than 220 countries, the GSMA unites nearly 800 of the world's mobile operators with 250 companies in the broader mobile ecosystem, including handset and device makers, software companies, equipment providers and Internet companies, as well as organisations in industry sectors such as financial services, healthcare, media, transport and utilities. The GSMA also produces industry-leading events such as Mobile World Congress and Mobile Asia Expo.

For more information, please visit the GSMA corporate website at www.gsma.com. Follow the GSMA on Twitter: @GSMA.