

Ericsson's complementary comments to the RSPG Public Consultation on the Draft RSPG Opinion "a Radio Spectrum Policy Programme (RSPP)"

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Ericsson is grateful for the opportunity to provide comments to the RSPG Public Consultation on the Draft RSPG Opinion "a Radio Spectrum Policy Programme (RSPP)"

In addition to the responses from GSA and DE, associations of which Ericsson is a member, we would like to further elaborate on some items, as follows



In relation to Spectrum needs and supporting EU vision/policies (3)

Ericsson notes that the RSPG does not suggest any quantitative target in RSPP and follows instead a generic description. While we understand that a quantitative assessment is a difficult activity, we believe that clear and measurable targets are essential for the success of RSPP. We believe that it is of fundamental importance to predict the spectrum needs for 2025-2030 and beyond to address the future requirements of IMT-2020 (5G NR) and its evolution.

Guidance on this matter is provided by Coleago Consulting in a report¹ that estimates the IMT mid-bands spectrum needs in the 2025-2030 timeframe in Europe in order to achieve the 5G vision. The report concludes that using an additional 1 to 2 GHz of upper mid-bands spectrum would enable operators to deliver the IMT-2020 targeted citywide “speed coverage” of 100 Mbit/s user experienced downlink data rate and 50 Mbit/s uplink data rate, in an economically feasible manner. This same additional spectrum would also allow other use cases that play an important role for the development of the smart cities of the future. Moreover, it can be used for FWA in small towns / rural villages to fulfill the EU Connectivity goal of bringing 100 Mbps to all European households by 2025. Additional mid bands spectrum will also be key to support advanced connectivity along main transport routes (including highways).

Hence, we would like to emphasize on that the need for additional spectrum and harmonization for the near future is critical around upper mid-bands as decisions on the two candidate bands (namely the 3.8-4.2 GHz and 6 GHz bands) are being taken in many countries. Given these limited options, it is crucial to make available the needed upper mid-bands spectrum and to make sure that current and future decisions in Europe do not hinder the realization of the ITU-R IMT-2020 vision.

We believe that **both** the 3.8-4.2 GHz and the upper 6 GHz (i.e. 6425-7125 MHz) bands will be required to enable this vision, to meet the future connectivity needs of consumers and 5G verticals and to address the EU policy objectives in an economically sustainable manner in the 2025-2030 timeframe.

On the next steps in relation to the 3.8-4.2 GHz band, Ericsson recommends that the European Commission further considers the possible harmonization of the band 3.8-4.2 GHz (or part thereof) for MFCN/ECS targeting nationwide applications and taking into account incumbents’ use. This can be realized by means of an EC mandate to CEPT to trigger the work. Noting that national licensing allows MNOs to have the opportunity to utilize spectrum for both nationwide coverage and local services either directly (e.g. through network slicing) or via spectrum leasing models, allowing for an efficient use of the spectrum We strongly believe that decisions on making available the 3.8-4.2 GHz spectrum on a local basis could restrict the ability to address the needs for nationwide spectrum in the 2025-2030 timeframe, which in turn may hinder

¹ <https://www.coleago.com/app/uploads/2021/01/Demand-for-IMT-spectrum-Coleago-14-Dec-2020.pdf>



achieving the IMT-2020 targets and affect the EU vision/policies. We refer to the GSA response on spectrum needs for further details.

As for the upper 6GHz band (6425-7125 MHz), we believe that this frequency range represents a key opportunity for CEPT countries, especially considering that the lower part of the band (i.e. 5925-6425 MHz) has already been harmonized for license-exempt use in Europe, thus making the upper part of the band crucial for the future development of IMT. We urge CEPT administrations to consider the 6425-7125 MHz for IMT and to actively engage in the WRC-23 process aiming at the IMT identification of the band based on the results from sharing and compatibility studies.

The 2012 RSPP played a fundamental role in establishing the foundation for the successful European 5G spectrum strategy. We believe that similar efforts are needed from the new RSPP to keep the same level of ambition by creating the conditions for future spectrum availability in the mid-bands to further support the development of 5G and beyond.

In relation to Innovative wireless services (3.1)

Ericsson understands the RSPG goal to ensure high data rates in e.g. homes or offices, by ensuring availability of spectrum for WAS/RLAN applications. Ericsson would like to emphasize that the WAS/RLAN data rates should be consistent with the data rates provided to the WAS/RLAN access point. Thus, Ericsson would suggest Member States to examine the infrastructure capabilities (e.g. Fixed Wireless Access – FWA, or Fiber) in conjunction with spectrum decisions for WAS/RLAN.

In relation to Green Deal / Climate change (6.2)

As explained in the GSA response, Member States should initiate strategies within the ICT sector including the wireless sector, which should acknowledge the reduction of the sector's own carbon footprint as well as its ability to help other sectors decarbonize. Notably the latter is where the networks could have a substantial impact on reducing carbon emissions.

Ericsson would further like to note that there are already existing initiatives such as Green Digital Coalition and the Green Digital Ministerial Declaration².

In relation to National security, Network security and Cyber security (6.4)

Ericsson views the EU 5G toolbox as a holistic approach to ensuring security of end-users, whose security experience is defined by the security status of deployed networks. The EU 5G toolbox offers a broad set of tools that aim to reinforce and in a joined-up manner address risk in deployed networks. This is an

² <https://ec.europa.eu/digital-single-market/en/news/companies-take-action-support-green-and-digital-transformation-eu>



essential quality of the approach, as there are no-silver bullet solutions that can improve security. Also, the EU 5G toolbox identifies a number of key stakeholders, operators, vendors and integrators that impact the security posture of deployed networks, which is essential to ensure that protecting deployed networks is a collective effort.