

Response to the Public consultation on the Draft RSPG opinion on a Radio Spectrum Policy Programme (RSPP) – version 1

SNCF welcomes the opportunity to provide feedback on the RSPG opinion on a new RSPP which will guide the European Union spectrum strategy into the next decade.

In France and under normal (pre-COVID 19) circumstances, SNCF operates a network of 30 000 km of rail with a traffic of 15 000 trains per day (including high speed trains at 350 km/h) carrying 5 million passengers per day. At every stage of the pandemics, SNCF is working with State and regional authorities to assist health authorities and keep mobility services essential to the economy running (commuter travel and transport of essential goods). Over the long term, the Group's objective is unchanged: become a world-class champion of sustainable mobility for passengers and freight by 2030, with rail as its core business and France as its touchstone country.

Access to spectrum is identified as a vital input for SNCF as we operate or are deploying dedicated radio networks specifically designed for Control & command (currently GSM-R and in the future FRMCS) and for automated urban rail optimization (CBTC NEXTEO under deployment in Ile de France), as well as PMR based systems (currently Tetra and evolving to 4G and 5G). We are also exploring use cases based on 5G and other innovative technologies.

Therefore, SNCF welcomes the identification of transport communications as one of the policy areas highlighted in the opinion for which sufficient spectrum should be made available.

In addition, after a full regulatory cycle taking account of the RSPG opinion on ITS and resulting in the preparation of EU decisions for FRMCS and Urban rail ITS, we note that "section 3.3 Transport" of the draft opinion identifies the importance of Member States support during the implementation phase, a recommendation that we fully support. As mentioned in the same sub-section, the development of connectivity on board the trains based on EU harmonized spectrum is also to be encouraged, both for business applications and for the passengers' direct access to connectivity.

Finally, SNCF welcomes the identification in "section 3.6" of spectrum for public transport purposes as a potential lever in response to combat climate change.

In conclusion, SNCF is supportive of the views expressed in the draft opinion concerning our sector and is looking forward to the next steps in the preparation of a new RSPP.