

Response of the LoRa Alliance to Radio Spectrum Policy Group [Draft] Opinion on a Radio Spectrum Policy Programme

The LoRa Alliance welcomes the drafting of a new Radio Spectrum Policy Programme (RSPP) for Europe and thanks the Radio Spectrum Policy Group (RSPG) for the opportunity to share its views about the Opinion on the new RSPP.

RSPP developed in 2012 has provided a forward-looking vision on the harmonisation and on the adoption of spectrum policies for the spectrum management that enabled the development of essential steps towards for the digitalisation of the European economy. RSPP in 2021 has to not only confirm earlier policies that made the success of the European regulation but also respond to ambitious regional political objectives.

The importance of the connectivity is well recognised to achieve the European ambitious objectives and the RSPP will have to define spectrum policies for the connectivity to respond to the political objectives.

Technology neutrality and spectrum sharing and spectrum needs

Thousands of IoT projects around the world already prove the benefits of the IoT connectivity and specificities of different types of connectivity; LoRaWAN networks already power large majority of verticals¹ (agriculture, buildings, cities, industries, logistics, utilities) ... fulfilling many European objectives of Green Deal or Europe's digital future.

- *in a single network deployment, a large number of automated, 'intelligent' services – from smart metering tools and smart parking sensors to smart streetlights and smart environment trackers – can be delivered to end-users (i.e., the citizens), and*
- *interference immunity, strong security assurance, and excellent long-range communication capabilities all combine to make LoRaWAN the perfect LPWAN protocol to be used in smart city applications.*

As Wi-Fi has proven the benefits of the unlicensed spectrum for the broadband services, LoRaWAN is also proving the benefits of the unlicensed spectrum sharing for the IoT applications.

Therefore, the LoRa Alliance would like to insist on the need to adopt a holistic view in RSPP regarding spectrum management and technology neutrality to address European objectives.

Moreover, when addressing the spectrum needs in low or medium frequency bands range, the LoRa Alliance totally agrees with the RSPG recommendation “that the Commission, the Council and the European Parliament also take note of specific strategic EU policies regarding services other than electronic communication services (ECS), for which spectrum needs should be addressed”. These EU policies as detailed before could be fulfilled by non-cellular, non-ECS.

¹ LoRaWAN Vertical Markets : https://lora-alliance.org/?gclid=Cj0KCQiAyoeCBhCTARIsAOfpKxj7-UVJTjFTtaXWPV5dcXkp7fl_41XHP5eqwRuk8HEhKlvAeG6ydtEaAjiKEALw_wcB



It is then crucial for the spectrum efficiency and the saving of resources (including financial ones) to consider specificities of all available networks in the definition of the spectrum policy Europe needs and to enhance the technology-neutral approaches and authorization regimes that made the success of the European regulation.

To maximise the benefits of the unlicensed spectrum, the LoRa Alliance support the spectrum EC-CEPT-ETSI governance as main pillar of the spectrum harmonisation in Europe.

The implementation of harmonised technical conditions, the coordination of rules (ETSI specifications, ECC Decisions or Recommendations) for Members States are essential for the continuity of services, the roaming of devices in the whole region and eventually the success of the European political goals.

LoRa Alliance supports to shorten gap between ETSI harmonised standards, the ECC rules and national implementations as standard practice in the Union.

Spectrum needs and supporting EU vision/policies

“Member States and the European Commission should ensure long-term spectrum availability and protection for radio systems supporting them. Member States should cooperate as necessary in order to assess and solve radio interference into these services”. As a consequence, European Commission and Members States may ensure protection of some networks (even in license-exempt spectrum) when those networks support the EU Vision and essential goals fighting climate change or digitalising smart cities for example.

A European position to provide certainties for in the band 470-960MHz (for upcoming WRC-23 and beyond) for services deployed in this band especially for services that bring direct benefits to Europe for Green Deal or Digital Society.

Regarding the spectrum inventory, a precise inventory would naturally make easier any spectrum decision; the efforts of the European Commission and Member States should be maintained not only for potential bands for wireless broadband services but also for all strategic applications that contribute to the success of the European political goals as explained in previous paragraph.

The LoRa Alliance remains available for meeting and discussing the proposed suggestions as well as opportunities for LPWAN / LoRaWAN development and deployment in Europe.



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