



Hewlett Packard
Enterprise

Response to the ‘Public Consultation on the Draft RSPG Opinion on a Radio Spectrum Policy Programme (RSPP)’

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Introduction

Hewlett Packard Enterprise (HPE) welcomes the opportunity to respond to the '*Public Consultation on the Draft RSPG Opinion on a Radio Spectrum Policy Programme (RSPP)*' issued by the Radio Spectrum Policy Group (RSPG).

HPE is a global technology leader focused on developing intelligent solutions that allow customers to capture, analyze and act upon data seamlessly from edge to cloud. Its Aruba Networks division is a leader in Enterprise Network and Mobility Solutions and the world's second largest provider of Enterprise Class Wireless Access Points.

HPE comments to the RSPG Public Consultation

Below please find our comments to the Public Consultation.

General

HPE commends the RSPG for taking a forward-looking approach to spectrum management that promotes an efficient use of spectrum by fostering innovative spectrum sharing methods. In line with this approach, the new RSPP should explicitly acknowledge the needs of all spectrum users by postulating a balance between licensed and license-exempt spectrum and observing the principle of technology neutrality. We are confident that by adopting these regulatory principles, the new RSPP will profoundly contribute to fulfilling the ambitious targets for Europe's Digital Decade and related European initiatives.

Spectrum Sharing

HPE fully concurs with the RSPG's view that sharing spectrum is the way forward in order to use this increasingly scarce and valuable resource in the most efficient way.

Successful spectrum sharing has long been practised in the bands opened for license-exempt use where technologies such as Wi-Fi coexist with licensed incumbent users as well as with other license-exempt systems. The ability of Wi-Fi to operate in shared bands has greatly advanced the digitalisation of European society by providing reliable and affordable wireless broadband connectivity for users across all segments. The capacity provided by Wi-Fi for offloading mobile traffic has also been instrumental to the success of 3G and 4G cellular communication systems, and we expect this to continue with 5G and beyond.

Given the substantial importance of license-exempt spectrum in both technical and socio-economic respects, we urge the RSPG to include in the new RSPP objectives to provision a sufficient amount of license-exempt spectrum for WAS/RLAN, first and foremost in the mid-band range.

Within the mid-band, the 6425-7125 MHz band (the 'upper 6 GHz band') is of particular importance. It is a natural extension of the 5945-6425 MHz band (the 'lower 6 GHz band') which has recently been authorized for license-exempt use by the CEPT. Given the similarity of the incumbent situation in the upper and lower 6 GHz bands, it is expected that WAS/RLAN will be able to operate in the upper 6 GHz band under essentially the same regulatory conditions as in the lower 6 GHz band. Globally, the full 5925-7125 MHz band (the '6 GHz band') has been or is being opened for license-exempt use by a growing number of leading countries in all three ITU regions. In the interest of global harmonization of the 6 GHz band for license-exempt use we invite the RSPG to support this objective in the new RSPP.

While WAS/RLAN low-power indoor (LPI) and Very Low-Power (VLP) systems can share spectrum with incumbent users on a license-exempt basis, higher power systems (indoor and outdoor) can potentially operate in the 5925-7125 MHz band under a light licensing regime. Where authorized, outdoor Wi-Fi systems are already today playing an increasingly important role in providing connectivity on company and university campuses, on large industrial sites, in public areas and at major outdoor events but also for fixed wireless access (FWA). With Wi-Fi 6E, the level of performance and the quality of service available to outdoor users can be enhanced dramatically.

HPE therefore encourages the RSPG to promote, as a first step, trial deployments of higher power WAS/RLAN systems in the 5925-7125 MHz band on a light licensing basis, also taking into account the application of dynamic database concepts such as Automated Frequency Coordination (AFC) in the United States and South Korea.

Licensing and Spectrum Awards

HPE shares the view expressed by the RSPG that innovation is spurred by diversity of authorization methods and technology. We consider both local licensing and license-exemption reasonable and complementary authorization methods for efficiently utilising unused or underused spectrum for local and private networks. We understand that the RSPG proposes to decouple national

licensing from local licensing which is an approach we fully support. We also recommend the RSPG adopts a “use-it-or-share-it” policy to prevent licensees from hoarding valuable spectrum resources.

We further support a harmonization of the 3.8-4.2 GHz band for use by local and private networks. A situation like the one currently experienced in Europe, i.e., with band allocations for local and private networks varying considerably between countries, will inevitably result in increased equipment cost and reduced product variety.

Spectrum needs and supporting EU vision/policies

As acknowledged by the RSPG, a sufficient amount of spectrum must be made available to support European ambitious policy initiatives such as Europe’s Digital Decade, the Green Deal, the Gigabit Society, the New Industrial Strategy for Europe, and the Digital Education Action Plan.

Hence, HPE applauds the RSPG’s request to the European Commission and Member States to contribute to improving broadband connectivity by ensuring availability of spectrum for WAS/RLAN applications and to evaluate innovative spectrum sharing solutions.

To this end, we invite the RSPG to include a requirement in the final Opinion to identify spectrum needs for licence-exempt technologies, first and foremost in the mid-band which is particularly well suited for indoor coverage. Special consideration should be given to the need to extend the gigabit speeds provided by fibre, cable, and fixed wireless access networks to the users the large majority of whom will be located inside buildings.

HPE contact information

In case of questions please do not hesitate to contact the HPE representative(s) listed below:

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