

# ETNO comments on the Draft RSPG Opinion on Common Policy Objectives for WRC-15



January 2015

## Executive Summary

ETNO welcomes the opportunity to comment on the draft RSPG opinion on Common Policy Objectives for WRC-15 and to provide its point of view on some of the topics proposed.

In particular ETNO is of the opinion that:

- a co-primary mobile allocation for the band 470–694 MHz is an essential prerequisite to provide flexibility to administrations for the future introduction of converged services in Europe;
- in addition to the 1427-1518 MHz band, the band 1350-1400 MHz should be allocated to the Mobile Service in all three regions and identified for IMT uplink;
- the 2700-2900 MHz band is not used efficiently and is therefore a good candidate for IMT applications as it is very close to the already existing 2,6 GHz band (2500-2690 MHz);
- as for the C band, ETNO believes that it should be allocated to the Mobile Service on a primary basis and identified for IMT;
- in the UHF band, no further regulatory provisions related to the coexistence with broadcasting have to be adopted in the Radio Regulations;
- the harmonized MFCN frequency arrangement in the band 694-790 MHz should include the option for unpaired frequency arrangement (SDL) channeling in the duplex gap of the paired 700MHz channeling plan.

Finally ETNO supports the proposal of a future Agenda Item addressing the spectrum needs for the next generation of mobile services, not limiting the focus to frequency ranges above 6 GHz.

## Introduction

ETNO welcomes the Radio Spectrum Policy Group invitation to express comments and views in relation to the draft RSPG Opinion on Common Policy Objectives for WRC-15.

The World Radiocommunication Conference is a very important periodic milestone for global spectrum management and therefore special care has to be put in preparing the positions on the various Agenda Items.

Several Agenda Items of the next WRC are addressing spectrum policies which are of interest for the European Union.

Concerning the electronic communications sector, we are facing a very rapid take-up of new 4G-based mobile broadband services that will result in a fast increase of data capacity demand.

The following are ETNO comments related to specific Agenda Items.

## ETNO Comments

### Agenda Item 1.1

ETNO supported, during the last WRC, the inclusion of an Agenda Item addressing the identification of new spectrum to be allocated to Mobile Service and identified for IMT.

Such an A.I. was also felt to be an essential tool to cope with certain objectives of the European Digital Agenda, such as the “broadband for all” target. Furthermore, this new spectrum has to be harmonised as this is the only way to reach the necessary economies of scale.

In this context, we consider as essential the harmonization activity developed by RSPG, CEPT and the Commission to extend the existing allocations for electronic communication services in EU Member states to a global level to gain benefits from economies of scale and increased opportunities.

### *470-790 MHz*

The UHF band, in general, is considered a very important band and therefore ETNO would welcome and participate to any further initiative aiming at the development of a long-term strategic policy on the future convergence between broadcasting and mobile platforms and the delivering of media/audiovisual services and high-audience video and data to mobile devices.

For this reason we believe that the co-primary mobile allocation for the band 470–694 MHz is an essential prerequisite to provide flexibility to administrations for future introduction of such converged services and to foster investment in the development of such converged services and applications in Europe.

### ***1350-1518 MHz***

ETNO welcomes the RSPG proposal to identify the band 1427-1518 MHz for IMT.

ETNO believes that an identification for IMT of the 1427-1518 MHz band will be highly beneficial for the development of mobile broadband networks, both in terms of capacity and coverage.

In addition to the rather narrow 91 MHz of the band 1427-1518 MHz the band 1350-1400 MHz should also be allocated to mobile in all three regions and identified for IMT. ETNO thinks that the band has great potential for harmonisation for mobile broadband network uplink.

### ***2700-2900 MHz***

The band 2700-2900 MHz has been under the spotlight recently in the context of the Spectrum Inventory analysis undertaken by the European Commission. The outcome of the Inventory has been that the band is “substantially underutilized” in most Member States. This means that the band is not used efficiently and makes it attractive as additional spectrum for IMT applications as it is very close to the already existing 2,6 GHz band (2500-2690 MHz).

The two bands have very similar radio propagation characteristics, which means that the same cell sites could be re-used to provide additional capacity with similar coverage, thus allowing deployments to proceed relatively quickly and cost-effectively. There could also be benefits to be gained in terms of cost and complexity of mobile devices.

### ***3400-4200 MHz***

Concerning the C band, ETNO agrees on the worldwide allocation to Mobile Service on a primary basis and identification for IMT, thus enhancing economies of scale and increased opportunities both for the industry and the users.

The lower part of this band, ranging from 3400 to 3800 MHz, is not used yet by mobile cellular service due to a variety of reasons, e. g. the present regulatory environment that gives priority to the incumbent wireless operators and the lack of devices that support the 3400-3800 MHz band.

With the LTE-Advanced take off in the coming years, the need for greater carrier bandwidths and aggregation will be substantial and the 3400-3800 MHz band (and potentially also 3.8-4.2 GHz in the mid/long term) can be envisaged as an attractive solution for mobile broadband services.

ETNO would like to point out that the European position for agenda item 9.1.5 needs to be aligned with this issue.

### **Agenda Item 1.2**

ETNO supports the proposal of fixing 694 MHz as the lower edge for the allocation to Mobile Service on a co-primary basis with the Broadcasting Service and identification for IMT in the 700 MHz band, while ensuring protection of the Broadcasting Service below 694 MHz.

ETNO also agrees with the RSPG Opinion that no further regulatory provisions related to the coexistence with broadcasting have to be adopted in the Radio Regulations in addition to GE-06 agreement.

Concerning the harmonized MFCN frequency arrangement in the band 694-790 MHz, ETNO is of the opinion that it should include the option for unpaired frequency arrangement (SDL) channeling in the duplex gap of the paired 700MHz channeling plan. As a matter of fact, this possible solution may represent a more efficient and effective approach than other 'non-MFCN' options such as PMSE, PPDR, M2M in the duplex gap and in the guard bands (694-703 MHz and 788-790 MHz).

### **Agenda Item 1.3**

Regarding PPDR, ETNO recognizes that PPDR is a national issue and therefore has to be managed by national relevant authorities, although the identification of harmonized tuning "ranges" maybe beneficial for the sector.

### **Agenda Item 10**

ETNO is interested in participating in the activities regarding the studies and investigations on next generation mobile services (commonly known as 5G). Consequently, we support the proposal of a future Agenda item addressing the spectrum needs for the next generation of mobile services, not limiting the focus to frequency ranges above 6 GHz.