



RSPG – Public consultation on

***Draft RSPG Opinion
on Common Policy Objectives for WRC-15***

Submissions by PT Portugal



RSPG Consultation on “Draft Opinion RSPPG14-578 (rev1)”

Submissions by PT Portugal

Introduction

PT Portugal (PT) welcomes the opportunity to express its views on RSPG “Draft RSPG *Opinion on Common Policy Objectives for WRC-15*” (RSPG14-578 (rev1)).

PT agrees with RSPG in what concerns the EU policy areas identified as relevant to the specific WRC 15 Agenda Items.

From our point of view, WRC 15 Agenda items 1.1, 1.2 and 10 are of the most importance. Any decision adopted under these issues will impact significantly, and for many years, EU policies, especially those related with the Digital Agenda for Europe.

Technological evolution is fostering innovation and powering the convergence of sectors like social media and mobile communications.

Broadcast and mobile industries are undergoing a profound and rapid transformation process and its success is only conceivable and possible in a transparent, stable and predictable regulatory environment.

PT considers of great importance to give a clear signal and a signal of certainty to the stakeholders, especially to European manufacturers who have to face strong competition from abroad and, simultaneously, ensure the maintenance of qualified employment. It worth noting that decisions on radio spectrum use take usually between 6 and 10 years to have practical effect and to benefit consumers.



Comments regarding RSPG proposals under Agenda item 1.1

PT agrees with the harmonization of additional spectrum for electronic communication services on a global level to gain benefits from economies of scale and increased opportunities.

PT supports the RSPG proposal for Member States (MS) to ensure that at WRC 15 additional spectrum is identified for IMT and allocated to mobile service, namely the worldwide identification of the bands around 1.5 GHz and 3.4-3.8 GHz for IMT.

PT also supports the adoption of regulatory provisions to ensure equitable access to spectrum in harmonized frequency bands between countries.

PT agrees that frequency band 470-694 MHz should remain available for DTT in the foreseeable future and that MS should have the flexibility to use the 470-694 MHz band for WBB downlink.

PT can not endorse RSPG proposal for MS to support *“no mobile allocation in the lower UHF band (470-694 MHz)”*.

In fact, given that no provision of the RR can affect the rights of the European Union to implement the desired harmonised technical conditions and to make available the spectrum for stations of any type, the proposal do not favour innovation or investment and deters the emergence of alternative platforms.

It is our strong believe that maintaining the availability of the 470-694 MHz band for DTT operations, with sufficient spectrum, must not prevent the allocation of the band, on a co-primary allocation basis, to the WBB services already in the WRC 15. It is a matter of consistency with the European legal framework for electronic communications, networks and services, which determines the application, whenever possible, of the principles of neutrality, technology and service, and, above all, is a strong sign of commitment to innovation and the



development of converging technologies that can be given to European manufacturers and other stakeholders.

In our opinion a support for no mobile allocation, on a co-primary allocation basis, in the band 470 – 694 MHz is not consistent with the recommendation for that ***“Member States should have the flexibility to use the 470-694 MHz band for WBB downlink, provided that such use is compatible with the broadcasting needs in the relevant Member State and does not create a constraint on the operations of DTT in this band, including for neighbouring countries”***.

PT does not support the allocation of the frequency range 3.8 – 4.2 GHz to Wireless Broadband services.

Comments regarding RSPG proposals under Agenda item 1.2

PT supports all the RSPG proposals under Agenda item 1.2, including 694 MHz as the lower edge of the band, while ensuring protection of the broadcasting service below this frequency.

Comments regarding RSPG proposals under Agenda Item 10

PT supports a future Agenda item addressing the spectrum needs for the fifth generation of mobile networks (*“IMT FOR 2020 AND BEYOND”*¹ commonly known as 5G) with the focus above 6 GHz with the objective to promote arrangements at a global level.

— x —

¹ <http://www.itu.int/en/ITU-R/study-groups/rsg5/rwp5d/imt-2020/Pages/default.aspx>