

ORANGE response to the consultation on the Draft RSPG Opinion on WRC-15

Orange welcomes the opportunity to provide comments on the Draft RSPG Opinion on WRC-15.

We are aware of the impact of RSPG Opinions, which largely contribute to the Commission work and decisions on radio spectrum policy issues, including adequate forecast and timely availability of radio spectrum. Therefore the RSPG Opinion on WRC-15 is crucial for the future decisions on radio spectrum in the EU countries, in particular to respond predicted future market demand for mobile broadband by reason of the scale and effects of the proposed policy.

This Draft RSPG Opinion provides elements for a common policy objective under different WRC-15 Agenda Items thus offering guidance to Member States in developing ECPs within CEPT. Indeed, there is a clear link between the activities within CEPT on WRC-15 Agenda Items and EU policies. Thus EU Member States will follow common policy objectives at the final ECP adoption phase and during WRC-15.

WRC-15 will address necessary revision of the Radio Regulations in accordance with its agenda. Two Agenda Items (1.1 and 1.2) are of prime importance for the future mobile broadband expansion, allowing possible worldwide harmonisation of spectrum use for the mobile service which would result in economies of scale providing benefits to the customers and mobile industry. Orange would like to provide comments on “Elements for a common policy objective” related to the Agenda Items 1.1 and 1.2.

Our response to each of these is as follows:

Agenda Item 1.1:

We agree with the main policy objective for the Member States under Agenda Item 1.1, which is to ensure identification of additional spectrum for IMT and allocation to mobile services by WRC-15 .

We agree also with some of the proposed recommendations for the Member States, such as:

- *“support the harmonisation of existing allocations for electronic communication services in EU Member states on a global level to gain benefits from economies of scale and increased opportunities”;*
- *“support regulatory provisions in this spectrum which ensures an equitable access between countries”;*
- *“support no regulatory additional constraints to mobile service for the protection of aeronautical telemetry in the band 1429 – 1518 MHz”.*

We disagree with the proposed recommendation for the Member States related to the mobile allocation in the band 470 – 694 MHz, i.e. *“support no mobile allocation in the band 470 – 694 MHz”*. We support co-primary allocation to Mobile of the 470 – 694MHz band on a global basis by WRC-15 to harmonise allocation with other Regions. This allocation will provide enough regulatory flexibility in this band to respond particular needs of different countries and will allow the most efficient use of the band.

Concerning the candidate bands, the Draft RSPG Opinion recommends Member States to support the worldwide identification for IMT of the following additional frequency bands:

- 1.5 GHz, in particular 1427-1452 MHz, 1452-1492 MHz, 1492-1518 MHz
- 3400-3600 MHz
- 3600-3800 MHz

We support the above quoted candidate bands for IMT identification on a global basis.

However, we would like to draw attention to the following candidate bands, which are not listed in this draft RSPG Opinion but, in our opinion, have a great potential for IMT and are also supported by some countries in Europe and outside Europe:

- In the 1.5GHz range, also the 1350-1400 MHz sub-band offers significant potential for possibly harmonised mobile broadband use.
- The 2.7-2.9GHz band is adjacent to the existing IMT band at 2.6GHz thus future deployment costs could be optimised by using existing cell sites.
- The 3.8-4.2GHz band is used for satellite services in some parts of the world, however its allocation to mobile on a co-primary basis would provide Administrations more flexibility for its future use, depending on national needs.

We recognise, that conflicting interests may exist between different services, however RSPG Opinion should reflect the right balance between the need for a new allocation for mobile broadband services versus other services in the same frequency range.

To conclude, we support the candidate bands for IMT identification recommended in the draft RSPG Opinion. Furthermore, we support consideration of the bands 1350-1400MHz and 2.7-2.9GHz for IMT identification as well as 470-694MHz and 3.8-4.2GHz for mobile allocation on a co-primary basis by WRC-15.

Agenda Item 1.2

We agree with the recommendations for the Member States under Agenda Item 1.2.

In addition, we would like to highlight the importance of the harmonised band-plan for IMT in the 700MHz band, which consists in 2x30 MHz FDD aligned with the lower APT duplexer (uplink 703-733 MHz and downlink 758-788 MHz) and up to 20 MHz for supplemental downlink (SDL) in the duplex gap (738-758 MHz). This band-plan gives possibility to maximise the total amount of spectrum to be used for IMT in 700 MHz band.

Furthermore, we welcome and support the proposed actions regarding non-EU-countries. Indeed, the meetings between EU and third-countries could facilitate deployment of IMT/mobile broadband at the border of EU countries contributing to cross-border coordination discussions and agreements.