

Consultation question 1: Do you agree with this operating definition of WAPECS? Do you consider that the WAPECS concept should include spectrum intended for private, as well as public, applications?

A: In general we can support the proposed definition. We prefer a broad definition of WAPECS. We consider that WAPECS should include spectrum intended for both private and public applications.

Consultation question 2: Do you consider that the term “platform” should be more closely defined? If so, what definition do you propose?

A: There might be a need to make a closer definition, because the scope of platform is not very clear. On the one hand we would prefer flexibility in order to keep our options open. On the other hand it could be useful to indicate that platforms in this context means radio technologies that can be used for electronic communications services.

Consultation Question 3: What, if any, constraints should there be on the provision of services using spectrum primarily in the broadcast domain?

A: Currently our position is, that broadcast frequencies should be used for broadcasting only. If broadcast frequencies on the other hand are to be used for services other than broadcasting, then there should not be any constraints on this use, unless it limits the primary use for broadcasting purposes.

Consultation Question 4: What specific rules should be introduced or maintained to safeguard the delivery of Services of General Economic Interest in the future? Is it most appropriate to deal with these issues through the regulation of spectrum, or through other instruments such as competition law or state aid policy?

A: We have not developed a firm conclusion on this. It is probably most likely, that we will make regulation of spectrum. It is less likely that state aid policy will be used.

Consultation Question 5: How do you think changes in spectrum policy will impact on the requirement for standardisation? What policy will best ensure the timely availability of standards?

A: Changes in spectrum policy will decrease the need for the formal development of detailed standards regarding radio parameters such as modulation schemes, bandwidth requirements, transmitter powers etc., especially if spectrum trading and liberalisation is implemented on a large scale. Detailed development of standards can impede innovation and development of new technologies. Hence the requirements for standards are primarily for providing frameworks for the use of spectrum. These framework standards should only cover necessary parameters to avoid harmful interference.

Consultation question 6: Are there any other challenges that the RSPG should consider?

A: Changes in regulation now take place in several countries in Europe. Spectrum trading and liberalisation is introduced in some countries, while others hesitate to introduce these tools. It is likely that the difference in the regulatory approach will increase in the next few years within the EU, since some countries will be more liberal than others. It is a major challenge for operators, service providers and industry to navigate in many different markets with different rules. Hence it could be useful to reach a common understanding in the field of spectrum trading and frequency liberalisation.

Consultation question 7: What is your view on the above-mentioned issues and more specifically on how to achieve the right balance between “minimising and harmonising constraints” presented above?

A: We think that some minimal conditions should be harmonised on a EU-level. It might also be useful to specify a maximum of requirements.

Consultation question 8: Are there any other long term policy goals that the RSPG should consider?

A: We would prefer to see the results of the work related to WAPECS, in particular the request for opinion, before other long term policy goals are considered.

Consultation Question 9: Do you think that these steps form an adequate basis for achievement of the European objectives in this area? Are there any other steps that are required?

A: We can support that RSC prepares a mandate for CEPT in order to identify frequency bands for WAPECS. The RSC should report back to the RSPG on the proposed issues.