

Consultation in the context of the development of an RSPG Opinion on priorities and objectives for the Community in the World Radiocommunication Conference 2007.

TIM welcomes RSPG public consultation on priorities and objectives for the Community in the WRC-07 and is pleased to submit its initial comments on the consultation itself.

Nowadays there is a growing awareness of radio spectrum issues in the Community and this trend requires to put the WRC activity within the Community contest.

TIM believes that the Community policies in the mobile field will be affected by regulatory decisions which will be taken at the WRC-07.

1) What are the agenda items at WRC-07 (to be specified by the respondent) which potentially could have a significant positive or negative impact on common European policies and on important pan-European industrial sectors?

From the Mobile Service point of view, the following are the agenda items which will have a significant impact both on the European policies and on the industrial sectors.

- **Agenda Item 1.4:** *to consider frequency-related matters for the future development of IMT-2000 and systems beyond IMT-2000 taking into account the results of ITU-R studies in accordance with Resolution 228 (Rev.WRC-03)*

In Resolution 228, as revised by WRC-03, ITU-R was invited to further study technical and operational issues relating to the future development of IMT-2000 and systems beyond IMT-2000, and to develop Recommendations as required and to report, in time for WRC-07, on the results of these studies.

TIM believes that:

- the studies should focus on the long term market requirements, the evolving user needs, including the growth in demand for IMT-2000 services;
- as far as spectrum is concerned, ITU should focus on the estimation of the frequency requirements for the future development of IMT-2000 and systems beyond IMT-2000. Further spectrum is expected to be needed in addition to that identified for IMT-2000 at WARC-92 and WRC-2000;
- globally common spectrum and harmonized frequency arrangements for the future development of IMT-2000 and systems beyond IMT-2000 should be pursued to ensure global roaming and equipment-cost reduction through economies of scale;
- the market and technical requirements to facilitate the cost-effective deployment of a new radio interface(s), when determining potential frequency ranges, should be considered.

It is expected that IMT-2000 will be continuously developed, and no end-date of this enhancement process is foreseen at this stage. Evolutionary development of IMT-2000 in terms of enhancements of technical capabilities, available services and applications, will be progressively introduced in the coming years.

These initial enhancements, for which standards are already being developed, will be followed by further enhancements that could increase the peak aggregate useful data rate up to approximately 30 Mbit/s.

In conjunction with the future development of IMT-2000 and systems beyond IMT-2000 relationships will continue to develop between different radio access and communications systems, for example wireless personal area networks (WPANs), wireless local area networks (WLANs), digital broadcast and fixed wireless access (FWA).

- **Agenda Item 1.9:** *to review the technical, operational and regulatory provisions applicable to the use of the band 2 500 - 2 690 MHz by space services in order to facilitate sharing with current and future terrestrial services without placing undue constraint on the services to which the band is allocated*

The scope of this agenda item addresses technical, operational and regulatory provisions applicable to the space services systems transmitting stations in regard to potential victim terrestrial stations in the Fixed Service or Mobile Service, in the band 2500 - 2690 MHz.

Future deployment of terrestrial IMT-2000 systems in the 2500 - 2690 MHz should be fully safeguarded.

The band 2500 - 2690 MHz is currently allocated in CEPT to the Fixed and Mobile services for a variety of applications such as ENG/OB (programme-making), Wireless Local Loop, Point to Point Systems, etc. This band was identified at WRC-2000 as an additional band for IMT-2000 and ECC Decision(02)06 designates this band for use by IMT-2000 by 1st January 2008. A further ECC Decision on the detailed frequency arrangements for the band is also expected to be adopted by the end of 2004.

Therefore, TIM considers that it is necessary to ensure that the current use for terrestrial systems and the future use for IMT-2000 use of the band 2500 - 2690 MHz is protected against interference from other services.

- 2) Which are the broad objective which Europe could set itself for these agenda items, bearing in mind that many technical constraints are not yet clarified, and the fact that non-European interests might not support such objectives during the negotiations?

Concerning mobile communications, the European countries and the Community policy objectives to be met at the WRC-07 have their origin in the IMT-2000 services which have recently been launched in Europe. On one side, the gradual introduction of new services and terminals to customers and the continued transition to IMT-2000 services will need to be supported in the longer term by the provision of adequate spectrum according to market demands and taking account the evolution of technologies. On the other side, it will be essential to ensure that future development of IMT-2000 and systems beyond IMT-2000 will operate protected from harmful interference.

Comprehensive market studies are required to investigate the scenarios that likely may appear on the market place around 2015 and subsequent.

Globally harmonised frequency bands are important to facilitate global roaming of terminals. However, it was not possible in the past to harmonise all bands on global basis. Hence, a set of bands has to be made available for global roaming purposes.

Therefore, TIM considers that, from European perspective, harmonisation to the greatest possible extent has to be the objective in order to support market development in Europe.

It is worth underlining that for coverage limited scenarios, low frequencies have the advantage of reducing the number of base stations to be deployed. While, in capacity limited scenarios higher frequencies are of advantage due to lower interference from adjacent cells. With increasing capacities, higher channel bandwidths in combination with smaller cells are required.

Particular consideration has to be given to the new mobile interface. Due to the significantly higher peak data rates and likely higher required channel bandwidth, frequency bands have to be above the bands already identified for IMT-2000. Whereas upper boundary is determined by propagation conditions.

From customers perspective, seamless interworking between various radio access systems is highly desirable feature.

For the aforementioned reasons, TIM agrees with the mobile operators common position that ITU should finalize its studies on these issues in such a way that general agreement also outside Europe could be reached.

- 3) Is it currently foreseeable that there could be contrasting requirements for different Community policies which would need to be interpreted preferably before the WRC-07 negotiations? If so, where?

There should be contrasting requirements for different Community policies if the same frequency bands are allocated to different services.

- 4) How to effectively promote at the conference and within ITU the Common Proposals on spectrum selected by Europe in other regions of the world, in order to enable European industry and consumers to benefit from lower barriers to trade and greater economies of scale?

European administrations negotiate in ITU on a national basis. However, since the national interests are often convergent, European countries choose to develop their technical positions together within CEPT, where mechanisms to develop common technical approaches are already well established, before negotiating with the rest of the world on the basis of consolidated European positions defended by each individual European ITU member.

The ITU has encouraged in the past the formation of regional blocks in the WRC to simplify and clarify as much as possible all the issues before the conference itself. Therefore, the aforementioned organizations besides CEPT have also been increasingly developing their positions together (i.e. CITEL for the Americas, APT for Asia-Pacific, the Arab League and ATU for Africa). In any case, it has to be noted that collaboration within the aforementioned organizations has been improved.

In the WRC-03 preparation, meetings, seminars and workshops were organized between CEPT and the other regional organizations to define possible common positions and to participate effectively in the conference. These meetings are a very useful and important tool for the purpose of establishing contacts with other organizations and showing the interest of CEPT in their activities for the preparation of the conference.

- 5) How to ensure that generic regulatory principles enshrined in Community legislation for various spectrum-using sectors are supported in the WRC-07 process, and notably the principles of technology neutrality, fair competition, regulatory transparency, non-discrimination and proportionality, as well as the optimisation of spectrum use?

TIM believes that to ensure the achieving of Community policy objectives, it is necessary to establish clear and common positions at an early stage of the WRC-07 preparation. The Community approach is predicated on CEPT being able to develop coherent technical positions for Europe and on its ability to get results by a sufficient degree of negotiating solidarity between all its members at pan-European level.

The principles of technology neutrality, fair competition, regulatory transparency and worldwide harmonization of frequency bands are the main WRCs objective.

- 6) What should be the strategy approaches before and during the conference for European delegations to optimise the possibility to reach the above-identified common European objectives? Should some European Common Proposals be mandatory for EU members?

CEPT coordination before and during the conference has proved to be efficient. Potential conflicts are identified at an early stage of the WRC and therefore could be solved through regulatory and technical studies before the final step of the process which leads to the preparation of the European Common Proposals (ECPs). The common European objectives are well contained in the ECPs which are generally supported by most CEPT countries and should be supported by all EU Member States but should not be made mandatory.

- 7) Are the current procedural arrangements for the European WRC preparations, such as participation to and scheduling of meetings, drafting of European Common Positions and Briefs, availability of information, etc., appropriate? If not, please suggest ways to improve this process.

The current procedural arrangements for the European WRC preparations are quite appropriate and this is shown by the successful results for Europe obtained at the previous WRCs. It is worth noting that at the WRC-03, which was expected to be the most difficult WRC since the WRC process started, many of the ECPs submitted to the conference were accepted due to the good management performed by CEPT with the other regional organizations in the preparation of the proposals to the conference.

For the aforementioned reasons, TIM believes that the current mechanism to prepare the CEPT positions at the conference is working well and it doesn't need further improvements or refinements.

- 8) If applicable, please indicate your early views on issues Europe could propose to be included in the agenda for the next conference after WRC-07 (see the preliminary agenda proposed by WRC-03 in **annex 3**).

Preliminary views on this question should be evaluated in the following years well in advance of the Conference, bearing in mind that, for the time being, the date of 2007 is far away.