



Radio Spectrum Policy Group Secretariat
European Commission
Radio Spectrum Policy
Information Society DG, BU33 4/69
B-1049 Brussels

May 20, 2004

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

Dear RSPG Secretariat:

The International 450 Association (IA 450) commends the RSPG in launching this public consultation as the RSPG develops an advisory Opinion for the European Commission on policy priorities and objectives to be pursued by the European Community at the World Radiocommunication Conference in 2007 (WRC-07). The IA 450 is pleased to support the RSPG in this consultative process and will continue to support the RSPG in addressing important radio spectrum policy matters.

The IA 450, formerly known as the NMT Association, was formed four years ago to promote the use of the analogue and digital technologies in the 400 to 500 MHz band. Currently the IA 450 has 24 members including 10 operator members and 13 industrial members.

The IA 450 represents the interests of over 40 mobile operators, including operators in Scandinavia, Central and Eastern Europe and Russia, all of which operate in the 450-470 MHz frequency band as well as suppliers of NMT analogue equipment and/or equipment for the digital upgrade of 450 MHz systems.

Our members are active in providing service in Europe as well as producing equipment in the 450 MHz band that supports the European market.

In this consultation, we ask the RSPG to support the IA 450 position of identifying radio spectrum for the future development of IMT-2000 and systems beyond IMT-2000 at WRC-07. As indicated in Agenda Item 1.4 for WRC-07, Resolution 228 (Rev.WRC-03) sets the guidelines for studies on frequency-related matters for the future development of IMT-2000 and systems beyond IMT-2000. A section of Annex 1 of the RSPG consultation, entitled *Some WRC-07 Agenda Items and Issues of interest to the EC*, suggests a possible conclusion of WRC-07 that "...additional spectrum will have to be identified at a later date." The IA 450 encourages the RSPG to take into consideration that no additional spectrum was identified at the WRC-03 for future development of IMT-2000 and systems beyond IMT-2000. We believe that the RSPG should consider developments taking place in the European market and elsewhere in frequencies below 806 MHz instead of delaying a decision for another three years.

The IA 450 believes that the time is now to identify radio spectrum for future development of IMT-2000 and systems beyond IMT-2000 but recognizes the next opportunity for the international community to consider this matter is during WRC-07. The RSPG notes that Resolution 228 (Rev.WRC-03) instructs ITU-R to report on potential frequency ranges below those already identified for IMT-2000 for the future development of IMT-2000 and systems beyond IMT-2000, taking into account the extensive use of frequencies below 806 MHz for IMT-2000.

The IA 450 recommends that the RSPG include in its advisory Opinion a recommendation to support the identification of bands below 806 MHz for future development of IMT-2000 and systems beyond IMT-2000. As our members are well aware, the propagation and in-building penetration characteristics of IMT-2000 systems in bands such as the 450 MHz band make such systems well-suited to provide voice and enhanced data services particularly for offering cost effective solutions to provide wide-area fixed and mobile telephone coverage, particularly for vast rural and often underserved areas.

The IA 450 believes that the identification of these bands at WRC-07 will be an important step by the International Telecommunication Union to support deployment of advanced wireless services to communities that have no service or have experienced decades of poor service. The IA 450 notes that a number of countries are already deploying advanced wireless services in the 450 MHz band. In Europe this process is underway in accordance with EU34 footnote to the European Common Allocation Table. While 2007 is not soon enough, we believe that delay in the global identification of frequencies below 806 MHz until 2010 will be an opportunity missed by the international community to support policies and regulations that can address some of challenges that exist in today's digital divide.

The IA 450 is pleased to provide additional information and answer any questions that the RSPG may have regarding this submission.

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