



QUALCOMM Europe Inc

---

Via Tirso, 6  
00198 Roma  
Italy

c.a. Radio Spectrum Policy Group  
Secretariat  
infso-rspg@cec.eu.int

---

Rome, May 21, 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**

QUALCOMM, Incorporated appreciates this opportunity to provide comments to the Radio Spectrum Policy Group (RSPG) with regard to the April 14, 2004 *Consultation in the context of the development of an RSPG Opinion on priorities and objectives for the Community in the World Radiocommunication Conference 2007* (WRC-07).

QUALCOMM has a keen interest in WRC-07 as the work of the conference will have an impact on the continuing deployment of IMT-2000 systems, the future development of IMT-2000, and systems beyond IMT-2000, in which QUALCOMM has a significant interest.

QUALCOMM supports this consultative process and we provide the following specific comments in response to Question 2 of the consultation document.

**Agenda Item 1.4**

QUALCOMM encourages the RSPG to support the identification of further spectrum for the future development of IMT-2000 and systems beyond IMT-2000 at WRC-07. As indicated in the Agenda Item, 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. The studies that are being carried out under Resolution 228 were designed to provide WRC-07 with particular data that would allow this specific Conference to take action to ensure that adequate spectrum is available for the future development of IMT-2000 and systems beyond IMT-2000.

The work targeted for WRC-07 is of particular importance because there was little IMT-2000-related spectrum work undertaken at WRC-03. The last Conference to address spectrum issues for IMT-2000 was WRC-2000. While the RSPG consultation indicates that identifying new IMT-2000 spectrum may be justified in being delayed until 2010, QUALCOMM respectfully reminds the RSPG that the preliminary WRC-10 agenda does not currently address IMT-2000 spectrum issues. Given the difficulty of amending WRC agendas, QUALCOMM encourages the RSPG to encourage the identification of further IMT-2000 spectrum at WRC-07.

In addition, IMT-2000 equipment manufacturers require significant lead time to develop the network infrastructure and terminals to take advantage of newly identified spectrum. QUALCOMM believes that it is important to identify spectrum for the future development of IMT-2000 and systems beyond IMT-2000 in the near



**QUALCOMM Europe Inc**

---

Via Tirso, 6  
00198 Roma  
Italy

term in order to create certainty regarding frequency bands for advanced mobile services. Identification of further IMT-2000 spectrum at WRC-07 will allow the wireless communications industry to begin preparations to commercialize new equipment and new services designed for IMT-2000 and systems beyond IMT-2000.

#### **Identification of Bands Below Current IMT-2000 Bands**

Resolution 228 (Rev.WRC-03) also 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.

QUALCOMM encourages the RSPG to support the identification of such lower bands for IMT-2000 and systems beyond IMT-2000. The propagation characteristics of IMT-2000 systems in bands below 806 MHz make such systems well-suited for coverage of large areas with fewer base stations than would be necessary at higher frequencies. The identification of these lower frequencies will encourage the development of large-radius IMT-2000 base stations that are well-suited to service provision in rural and sparsely populated regions. Identification of bands below 806 MHz for IMT-2000 and systems beyond IMT-2000 will provide operators not only with a means by which to fulfill universal service obligations, but also to ensure that the advanced mobile services enabled by IMT-2000 and systems beyond IMT-2000 will be available to the largest possible proportion of users.

Moreover, QUALCOMM notes that there is already commercially available IMT-2000 equipment for use in frequencies below 806 MHz, clearly indicating a market demand for advanced mobile services using these lower frequency bands. Identification of bands below 806 MHz for IMT-2000 and systems beyond IMT-2000 will help to bring the identified IMT-2000 spectrum into line with existing market needs.

#### **2500-2690 MHz Band**

QUALCOMM supports the RSPG position that adequate protections should be implemented for mobile systems in the 2500-2690 MHz band. Because IMT-2000 systems could be operational in Europe in this band as early as 2008, QUALCOMM believes it is incumbent upon the RSPG to work toward this goal at WRC-07.

The lack of an IMT-2000 Agenda Item on the preliminary WRC-10 agenda, as indicated above, should also encourage the RSPG to target WRC-07 as the primary forum in which to ensure safeguards for planned mobile systems in the 2500-2690 MHz band.

#### **Agenda Item 7.2**

QUALCOMM encourages the RSPG to ensure that preparations for WRC-10 continue to include an Agenda Item on the consideration of allocations to the mobile service in the 802-862 MHz band in Region 1 following the transition from analog to digital television. As mobile usage increases and mobile spectrum becomes scarce, QUALCOMM believes that the newly available frequencies in the 806-862 MHz band should be allocated to the mobile service in order to provide adequate spectrum for the future development of IMT-2000 and systems beyond IMT-2000 and also to provide the opportunity for harmonization with mobile allocations in Regions 2 and 3.

As the convergence of broadcasting, telecommunications, and information technology services and devices continues, the availability of the 806-862 MHz band provides an opportunity to transition from a single use for this spectrum to a converged usage. As the 806-862 MHz band is freed from spectrally inefficient analog broadcasting usage, QUALCOMM believes it is important to continue to consider the allocation of this band for IMT-2000 and systems beyond IMT-2000, which can take advantage of convergence to provide advanced



**QUALCOMM Europe Inc**

---

Via Tirso, 6  
00198 Roma  
Italy

communications services including point-to-point and point-to-multipoint (broadcast) applications. Converged IMT-2000 broadcasting services are already available in several markets and the possibilities for such services continue to expand. Continued consideration of an IMT-2000 and systems beyond IMT-2000 allocation for this band in WRC-10 preparations will ensure that ITU-R continues to embrace and prepare for convergence by allocating adequate spectrum resources.

Isabella de Michelis di Slonghello

---

Director Government Affairs –  
Europe Qualcomm Corp.