

**France Telecom answer to the public consultation  
on “priorities and objectives for the Community in the World  
Radiocommunication Conference 2007 ”**

France Telecom welcomes the opportunity to respond to the public consultation on “priorities and objectives for the Community in the World Radiocommunication Conference 2007 ” launched by the Radio Spectrum Policy Group.

This consultation gives an opportunity to industry and telecommunication operators to underline their main interests concerning the various issues included in the agenda of WRC 07. Many issues included in the agenda of WRC 07 will result in Radio Regulation modifications which may impact common European policies and the development of the Information Society. Among these, France Telecom would like to underline the importance of third generation mobile communications related agenda items (1.4 and 1.9) for the development of a pan-European industry, and in particular for the telecommunication sector.

France Telecom believes that the results of this consultation would help the European Commission to finalise adequate policy guidelines

The preparation process implemented by CEPT for the various WRCs has been done up to now in a very efficient way, associating in the various debates representatives of administrations, operators and industry and leading to very wide consensus on European Common Positions. France Telecom believes that adequate action from EC in support to these ECP will be valuable in order to ensure the success of European positions.

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?

France Telecom considers that the following agenda items may have significant impact on the European policies and industrial sectors. Among these items, Agenda items 1.4 and 1.9 are particularly important for pan-European industry and in particular mobile telecommunication sector.

### **Agenda items 1.4; 1.9 / IMT 2000 and beyond**

The implementation and development of mobile networks based on IMT 2000 and its evolutions are key issue for the achievement of a widespread access to the European information society.

GSM network experience demonstrated successfully the positive outcomes of a European strategy based on an harmonised approach :

- Mobile penetration in European countries is at the highest level compared with the rest of the world.
- GSM standard covers close to 80% of the second generation mobile networks worldwide.
- European industry beneficieate from this remarkable development
- regarding infrastructure as well as mobile terminal manufacturing.

It is therefore important that 3G mobile communications networks develop in continuity with this successful experience, capitalizing on the existing market to provide ubiquitous access to enhanced services.

A favourable and predictable regulatory environment is needed to attract and encourage investments in this sector. In that respect, item 1.9 and 1.4 cover important medium to long term issues regarding 3G, in particular the protection of the band 2.5–2.69 GHz designated as an extension band for UMTS/IMT-2000 from satellite interference, the consideration of frequency related aspects for future developments of IMT-2000 and systems beyond IMT-2000.

### **Agenda item 1.11 / Broadcasting**

Terrestrial television networks will experience a major transformation in the coming years as they will move from analog to digital broadcasting. In parallel, it is expected that conventional TV services will evolve based on the growing availability of interactivity and on new needs in particular concerning mobile applications. Thus, the terrestrial broadcasting landscape should be modified significantly, based on the appearance of such new services towards customers, and possibly on the release of part of the presently used frequency bands for other purposes (called the digital dividend).

In that context, the proposition to introduce BSS networks in part of the band should be considered carefully.

### **Satellite issues**

#### **Agenda item 1.7 / Mobile satellite systems**

WRC-03 made a global allocation to the MSS (Earth to space) in the band 1 668-1 675 MHz, provided the result of sharing studies with services already present in the band will be brought to the intention of WRC-07 which will take the appropriate regulatory measures to insure that MSS and other services are equally protected. This allocation, adjacent to an existing MSS band will make it possible to reduce the operational constraints weighing on systems such as Inmarsat and will offer new prospects for the development of new MSS generation by European satellite manufacturers and for the distribution of broadband communication services by satellite operators.

### **Agenda item 1.10 / Fixed satellite systems**

WRC-03 has brought to the attention of WRC-07 the review of regulatory procedures and associated technical criteria of Appendix 30B without impact on existing allotments or assignments. These planned bands are currently used by European satellite operators and the review of regulatory procedures could make it possible to reduce the regulatory and technical constraints weighing on FSS systems in such frequency bands. This could enable European satellite manufacturers to enlarge their FSS coverage for the distribution of communication services. Moreover, preliminary discussions tend to link this agenda item with 1.19, which could raise political issues.

### **Agenda items 1.17, 1.18, 1.19 / Development of Fixed Satellite Services**

These issues impact the progress of the information society on one hand and of the European satellite industry on the other hand.

Further development of Fixed Satellite Services is considered with interest by telecommunication operators as a mean to complement their service offer. In that respect, spectrum requirements should be studied taking into account the existing technical solutions (Optical fiber, ADSL, FWA...) and overall economic aspects.

2) Which are the broad objectives 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?

### **Agenda items 1.9; 1.4 / IMT 2000 and beyond**

- Ag. It. 1.9

CEPT has identified the band 2500-2690 MHz as the primary extension band for UMTS/IMT-2000, in response to Commission Mandate 4. CEPT has recently taken the decision to designate the whole IMT-2000 extension band for terrestrial UMTS/IMT-2000 in response to the Commission Mandate 5.

From a European point of view, the objective of this agenda item will be to ensure the full protection of the future deployment of terrestrial UMTS/IMT-2000 in this band from satellite interference. This objective should be reached on a global basis. Another objective is to ensure that no constraints are imposed on terrestrial UMTS/IMT-2000 in view of protecting satellite services in the band.

The results already achieved at WRC-03 regarding the protection of terrestrial IMT-2000 from BSS (sound) interference should also be secured.

Besides the contributions to technical and regulatory studies, policy support is considered to be necessary to represent European interests for global availability of the band 2500-2690 MHz for IMT-2000 prior and during the Conference, in the negotiations and in bilateral meetings EC-Japan, EC-China, etc.

- Ag.It. 1.4

According to Resolution 228, this agenda item covers two aspects: the extension of coverage for UMTS/IMT-2000 services, and the evolution of IMT-2000 towards higher bit-rates in order to provide high bit-rate mobile services.

Regarding the extension of IMT-2000 coverage, there is a need to continue studies on the interest to identify the frequency bands below those already identified for IMT-2000 in order to answer coverage needs in remote and sparsely populated regions. Provisional studies undertaken on this issue confirm the clear economical and social impact of providing UMTS/IMT-2000 coverage at 470-600MHz compared to 2GHz bands in low density populated areas. The results of the Regional Radiocommunication Conference (RRC) has to be taken into account since RRC-04 and RRC-06 are defining the new digital plan for the terrestrial broadcasting in the bands 174-230 MHz and 470-862 MHz in Region 1. Due to the higher spectrum efficiency of digital technology the transition from analogue to digital broadcasting would release some spectrum in the band 470-600 MHz, so called 'digital dividend'. The possibility for the harmonisation of the digital dividend, with the aim of taking a decision at WRC-07 on possible worldwide allocation to the Mobile Service in bands below 600 MHz with identification for IMT-2000 should be the main objective.

Regarding high bite-rate mobile services, the aim is to take a decision at WRC-07 for identification of frequency bands, at WRC 07 or WTC 10, for IMT-2000 and system beyond. For that purpose, the preparatory process should be based on market study needs, as already engaged under the CEPT process, as it is an important step of the elaboration of the European position.

Market fragmentation based on possible development of competing technologies should be avoided. As well, designation of new frequency bands for mobile applications should be harmonised and made available in time with market needs.

#### **Agenda item 1.11 / Broadcasting**

The sharing criteria associated with the introduction of BSS networks in the 620-790 MHz band should be considered carefully, taking into account the protection of terrestrial services, in particular terrestrial broadcasting, but also possible new applications as a consequence of the digital dividend.

#### **Satellite issues**

##### **Agenda item 1.7 / Mobile satellite systems**

European countries should participate to the sharing studies and support the availability of the band 1 668-1 675 MHz for MSS operation, provided that other systems operating in the band are protected.

Due to the significant number of Radio-astronomy stations operating in the sub-band 1668-1670 MHz, it should be sustained that this frequency band is not to be used by MSS within the continental European boundaries (excluding overseas territories).

##### **Agenda items 1.10, 1.17, 1.18, 1.19 / Developments of Fixed Satellite Services**

- **Ag. It. 1.10**

The review of regulatory procedures and associated technical criteria of Appendix 30B Plan will raise numerous discussions and oppositions from countries deeply attached to the planned bands. However, the European satellite industry would require a high degree of relaxation in the criteria, in order to develop use of such frequency bands.

- **Ag. It. 1.17**

Main concerns around agenda item 1.17 include the protection of fixed service frequency bands around 1.4 GHz which are used, due to their favourable propagation properties, for

the provision of fixed wireless access to customers located in rural and sparsely populated areas. The interest within Europe for NGSO operating below 1 GHz connected to these service links is low.

- Ag. It. 1.18

The agenda item 1.18 is mainly dedicated to the consideration of sharing between NGSO and the fixed service, sharing between NGSO and GSO having been already addressed previously. The fixed service in the 17.7-19.7 GHz band should be protected, taking into account its importance for telecommunication networks and the large amount of fixed links deployed in this band in recent years .

- Ag. It. 1.19

The agenda item 1.19 proposes to identify possible new frequency bands for broadband satellite. The issue has already been considered by WRC03 under agenda item 1.25 concerning bands for HDFSS. Care should be taken that neither the conclusions of WRC03, nor the Radio Regulation should be modified by this new initiative.

### **Agenda Item 1.12**

This agenda item which addresses the application of Resolution 86 of the Plenipotary Conference is of major importance with regard to the publication, coordination and notification procedures for space services. This agenda item also address the clarification and simplification of Articles 9 and 11. It should be ensured that the result of this agenda item would not reduce the regulatory protection of terrestrial services in bands shared with satellite services.

### **Other issues**

#### **Agenda Items 1.2, 1.3, 1.5, 1.6, 1.8, 1.20, 1.21**

These agenda items should be followed carefully, in order to ensure that the regulatory decisions taken to promote the considered services or applications do not jeopardize the interests of communication networks operators.

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?

Some of the contrasting requirements which would need to be interpreted preferably before the WRC-07 negotiations have already been mentioned above. In general, identification of additional allocations for aeronautical mobiles, aeronautical telecommand or telemetry, maritime systems should not impact the band used by telecommunication operators.

Any other potential conflict identified should be analysed in the framework of the CEPT preparation process. Resolution of such conflict should take the best use of public consultations, CEPT technical, regulatory and taking into account market realities .

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?

The World Conference preparation process developed by CEPT (associating industry and administrations) in cooperation with the other regional associations has proved to be an efficient mean to move towards converging agreements during the Conference. Participation of representatives of other regions to Conference Preparatory Groups and reciprocally, as well as the work done during the Conference Preparatory Meetings help to avoid endless conflicts.

Support of European Union representatives to the underlying policy principles during this process should help to promote the positions expressed in the European Common Proposals for the benefits of the European countries.

The European positions and results of the common preparation with CEPT and industry organisations could be beneficially presented, explained and promoted in the meetings organised between the Commission and third countries (China, Asia, USA, Latin America, etc..) on a regular basis and included in their agendas.

In this context, Agenda item 1.9 would need important support and promotion efforts from the European Commission during bilateral and regional meetings. A clear commitment from Europe on the use of the band 2500-2690 MHz for terrestrial IMT-2000 and the promotion of globally harmonised IMT-2000 channelling arrangement in the band would be of great importance prior to WRC-07.

Special care has to be given also to Agenda item 1.4 concerning 'coverage' in the context of WSIS and its preparatory meetings in which the Commission is involved. Allocate globally harmonised frequency bands below those already allocated to terrestrial mobile services would help to reduce the 'digital divide'. The extension of mobile coverage seems the most efficient solution for providing low-density areas with the ICT infrastructures required for their opening up and economic development since mobile networks are characterised by lower roll-out costs and a higher speed of deployment.

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?

The aim of WRC is to progress towards worldwide harmonisation of frequency bands in order to foster the development of services for the overall benefit, through the improvement of the Radio Regulation, which has the value of an International Treaty and should be respected by all parties

The regulatory principles mentioned in the question are generally supported by the WRC approach, but on a case by case basis, it could be put into question by proposals made by different administrations, trying to promote particular technologies for their own interest.

Consequently, the various contributions to the Conference should be analysed accordingly, with a view to avoid infringements to these regulatory principles.

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?

The coordination organised by CEPT before and during the conference has proved to be very efficient. The main explication is that this process associates, at every stage, all concerned parties: administrations, regulatory authorities, telecommunications operators, industry, and other concerned representatives. The detailed and extended preparation process leads to European Common Position which are for the most supported by every CEPT member.

In addition, regular coordination meetings during the conference helps to maintain this coherence between the different country positions and to follow step by step the necessary negotiations issues.

As a result, the usual commitment of the CEPT members to the ECP is quite satisfactory.

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 preparation of the Conference done in CEPT within the framework of CPGs has been done until now in an very efficient way, associating in the various debates representatives of the administrations and of the industry. The availability of all the documents on the ERO website ensure transparency and information availability.

The duration of the process allows a full debate to be held and ensure the elaboration of a strong position of CEPT during the WRC.

One aspect for which some improvement may be explored is the coordination within CEPT and between administrations and the industry during final negotiations of the WRC; the representation at these meetings could be open to observers from the industry.

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.

It is important for Europe to give its views on the preliminary agenda for the subsequent conference and on possible agenda items for future conferences, taking into account Resolution 803 (WRC-03). The following items are considered as candidate items for the next conference after WRC-07:

- Future evolutions of mobile communications
- Development of nomadic applications
- Regulatory implications of the developments of convergence between Fixed, Mobile and Broadcasting services, terrestrial wireless interactive multimedia applications (TWIM)
- New methods for spectrum management
- Regulatory implications of the developments of new technologies (Software Designed Radio, Dynamic Spectrum Allocation...).