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RADIO SPECTRUM POLICY GROUP

RSPG response to the Commission Report on the Radio Spectrum

Inventory

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The RSPG is invited to consider and to approve for publication within the RSPG web site the attached 'RSPG response to the Commission Report on the Radio Spectrum Inventory'. It is proposed to publish it as a 'Position Paper'

RSPG Response to EC Report on Spectrum Inventory¹

Introduction

The European Commission (EC) has produced a report to the European Parliament and Council on an inventory of the radio spectrum in the frequency range 400 MHz to 6 GHz, as required by Article 9(4) of the RSPP².

In responding to the report the RSPG recognises that responses to detailed elements of the report are best dealt with through individual responses by Member States, either directly or through the Radio Spectrum Committee which developed the related implementing Decision 2013/195/EU. Therefore this response by the RSPG only considers the broader spectrum policy implications of the report.

RSPG Response

- **The RSPG shares the objective of the EC to ensure that spectrum is used efficiently and therefore acknowledges the EC attempts to undertake a spectrum inventory, noting that it is a challenging task.**
- **The RSPG proposes that the ultimate objective, making the appropriate spectrum (in terms of propagation, bandwidth and other relevant characteristics) available for WBB services and other strategic applications within the range 400 MHz to 6 GHz, can best be achieved through actions targeted on specific bands.**
- **The RSPG note that such an inventory (identifying existing uses of spectrum) is only one element in building up a picture of the demand for and supply of spectrum and the ‘tool’ devised by the Joint Research Council is unlikely to provide a complete picture of spectrum use within a country when used in isolation. The RSPG does not believe that a cost-efficient data analysis tool could properly reflect the technical, economical, operational, social and political complexity of the use of spectrum and of the possibility of sharing and migration**
- **The RSPG, in its future Opinion on the revision of the RSPP, will consider how to streamline the spectrum inventory, so as to focus it on efficient and cost-effective methods to respond to the policy objectives.**

Relevant RSPG activities

The RSPG developed a number of Opinions and Reports in support of the RSPP objectives:

¹ COM(2014) 536 final: Report from the Commission to the European Parliament and the Council on the Radio Spectrum Inventory

² The requirement in Article 9(4) of the RSPP is for a report on the “analysis of technology trends, future needs and demand for spectrum”.

1. **RSPG Opinion on spectrum review**³ which advised the EC and Member States on the issues which needed to be addressed in undertaking a spectrum inventory and in assessing demand for future significant uses of spectrum;
2. **RSPG Opinion on spectrum for WBB**⁴ which reviewed the spectrum in the range 400 MHz to 6 GHz to identify the feasibility of various frequency bands for use by WBB. There is also an associated report⁵ which looks at the prospects of key frequency bands for WBB in more detail;
3. **RSPG Report on strategic sectoral spectrum needs**⁶ which examined the spectrum needs of the non-ECS sectors including Galileo, GMES, intelligent transport management systems (ITS), smart energy grids and smart meters, safety services and public protection and disaster relief (PPDR), scientific services and programme making and special events (PMSE).

The RSPG welcomes the recognition by the EC that these are important sources in building a picture of the Europe-wide demand and potential availability of spectrum.

Furthermore, in the context of the RSPP, the RSPG has recently launched an activity examining the implications for spectrum management policies at the EU level of the growth in wireless backhaul for mobile networks (lessons learnt, various types of backhaul, trends, needs, etc.). Also, in June of this year (2014), the RSPG held a consultation meeting with the defence sector to consider various issues such as spectrum needs, sharing and the efficient use of defence spectrum.

The Spectrum Inventory

Article 9(2(b)) of the RSPP requires the EC to develop a methodology for the analysis of technology trends, future needs and demand for spectrum, in particular for those services which could operate in the frequency range from 400 MHz to 6 GHz. **The EC report acknowledges that building an inventory of spectrum use and availability is a multi-faceted process requiring the collation and analysis of information from various sources.**

The RSPG emphasise that such an inventory (identifying existing uses of spectrum) is only one element in building up a picture of the demand for and supply of spectrum and an inventory alone is unlikely to provide a complete picture of spectrum use within a country. The RSPG does not believe that a cost-efficient data analysis tool could properly reflect the technical, economical, operational, social and political complexity of the use of spectrum and of the possibility of sharing and migration. It should also be noted that providing access to information on spectrum usage has presented particular challenges to some Member States, including the format and availability of data and issues surrounding confidentiality of such information.

³ RSPG12-408 (Final): RSPG Opinion on Review of Spectrum Use

⁴ RSPG13-521 Rev 1: RSPG Opinion on Strategic Challenges Facing Europe in Addressing the Growing Spectrum Demand for Wireless Broadband

⁵ RSPG 13-522: Report on Spectrum for Wireless Broadband and Broadcasting in the Frequency Range 400 MHz to 6 GHz.

⁶ RSPG 13-540 Rev 2: RSPG Report on Strategic Sectoral Spectrum Needs

In this context it should be noted that the RSPG Report on strategic sectorial spectrum needs describes in a comprehensive way the technology trends, challenges and future demand of spectrum of others applications such as Galileo, GMES/Copernicus, intelligent transport management systems (ITS), smart energy grids and smart meters, safety services and public protection and disaster relief (PPDR) or scientific services.

In the RSPG Opinion on WBB it is notable that various frequency bands in the range 400 MHz to 6 GHz are identified as *unsuitable* as candidate bands for WBB (see Annex 1 of the Opinion), with other bands clearly identified as already in use or available, or with potential in the near or medium terms and one band (470-694 MHz currently used for DTT) identified as only having potential in a very long timeframe. The capabilities of the EFIS⁷ tool are also being strengthened with many new features being added to facilitate analysis of information on frequency usage within European countries.

Therefore, rather than relying on an inventory to identify potential bands, the RSPG would propose that **efforts of the EC and Member States would be better targeted on those frequency bands identified as potential bands for WBB or other strategic applications taking into account demand.** Issues such as timely availability of those bands, compatibility with other services, etc., could then be addressed. In this way the overall objective could be achieved more effectively and efficiently to the benefit of all stakeholders.

Harmonisation of Additional Frequency Bands

Art 6(5) of the RSPP requires the EC to assess and report to the European Council and Parliament on whether there is a need for action to harmonise additional frequency bands.

RSPG welcomes the recent initiatives from the European Commission in line with the recommendations of its Opinion on WBB (i.e. EC mandates to CEPT on 1452-1492 MHz, 2,3 -2,4 GHz and 5 GHz). RSPG is currently developing proposals for a long-term strategy on the future use of the UHF band (470-790 MHz) in the EU with a particular focus on the 700 MHz band.

The RSPG welcomes the conclusion in the EC's inventory report that, within the shorter time frame, there is currently no need for additional harmonisation of spectrum for WBB in the 400 MHz to 6 GHz range beyond the 1200 MHz target in the RSPP.

Nevertheless, Europe needs to monitor the continued increase in the volume of data traffic for delivery of wireless broadband services and of technology (ie, 5G, small cells). These factors will certainly have an impact on spectrum demand in the longer term with a consequent need for further harmonization of spectrum. The assessment of need for spectrum should be conducted following WRC-15 in order to take new developments and results into consideration.

⁷ ECO Frequency Information System – see www.efis.dk