

**Comment of MONTENEGRO in the public consultation on the
Draft RSPG Opinion on assessment of different possible scenarios for the use of
the frequency bands 1980-2010 MHz and 2170-2200 MHz by the Mobile Satellite
Services beyond 2027**

Mobile Satellite Service (MSS) network architecture in 2 GHz band could be based on LEO/MEO constellation or GSO satellites ensuring continuous service over European Member State territories as well as non-EU Member States as indicated in Document RSPG23-042. Considering that Montenegro joined RSPG as observer at the 61st RSPG Plenary meeting held on 14 June 2023, relevant information on existing licenses and the current use of 2 GHz band for MSS in Montenegro intended for necessary update of Document RSPG23-042, Section 1, paragraph concerning non-EU/EEA countries, including modification of text related to duration of rights issued, are provided as follows.

Pursuant to the current legal framework in Montenegro:

- MSS service provision: general authorisation in case of MSS service provision on the territory of Montenegro is envisaged but not granted since neither of incumbent MSS operators doesn't provide this service in Montenegro so far.
- CGC/EAN: Individual right of use for MSS radio spectrum in 2 GHz band for 2 CGC stations have been assigned to the selected operator Inmarsat Ventures Ltd, according to national legal framework for the period of 5 years validity, expiring on 25 April 2024.
- MSS user terminals are operating freely and are exempt from individual right of use in line of ECC Decision (12)01 on Exemption from individual licensing and free circulation and use of satellite mobile terminals operating under the control of networks in the range 1 to 3 GHz.

Bearing in mind importance of EU-wide common scenario establishment, spectrum requirements for various use cases necessary to accomplished EU strategic goals and in particular recognizing that future IRIS Satellite Constellation shall enable enhanced communication capacities to governmental users and businesses, increasing cohesion across territories allowing connectivity over geographical areas of strategic interest outside of the Union, Montenegro would like to indicate that opinions elaborated in Document RSPG23-042, considering 3 potential operators would be preferable for possible band segmentation of the 2x30 MHz available spectrum in the subject band.

With that regards, option 3 corresponding to 3 operators each to be assigned with 2x10 MHz, would provide a stable business environment for incumbent MSS operators, encourage the effective competition and create conditions for further development for the incumbent operators as well as new MSS operator. Furthermore, option 4 also corresponding to 3 potential operators to be assigned with 2x15 MHz, 2x10 MHz, 2x5 MHz, would provide stability of investments, competitiveness and further development for the incumbent as well as the new MSS operator, while this option will also take into account the principles of efficient and rational use of the radio-frequency spectrum at the same time reflecting its market value and potential to achieve further benefits for the society.

Having regard to the Regulation (EU) 2023/588 of the European Parliament and of the Council of 15 March 2023 establishing the Union Secure Connectivity Programme for the period 2023-2027 to which, inter alia, EU acceding countries and candidate countries may be allowed to participate as well as other related ongoing and future EU initiatives, Montenegro uses this opportunity to express its interest and commitment for active involvement in further developments of multi country projects and common objective of strengthening the digital sovereignty of the Europe as a whole.