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RSPG Secretariat

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**Input of Telekom-Control-Kommission (TKK) replying in the Public Consultation on the Draft RSPG Opinion on Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU**

Dear Sir or Madam!

- The Telekom-Control-Kommission (TKK) expresses its gratitude to the RSPG for preparing this balanced report and would like to take the opportunity to comment on it.

First and foremost, TKK is of the opinion that it is still too early to make statements about developments after 2030. TKK suggests continuing the discussion on the best possible long-term use of the UHF band and a review of the UHF decision around or after 2025 in line with the Lamy Report. TKK is convinced that the rapid digitalisation of all areas of life and the economy will continue in the future. The connectivity targets of the European Commission's Digital Decade 2030 goals stipulate that Member States should achieve nationwide coverage with Gigabit networks (all European households) and next-generation wireless high-speed networks with a performance at least equivalent to 5G (all populated areas) by 2030. When these targets are achieved, all European households as well as mobile devices throughout Europe will be able to connect to the Internet using very high speeds. This can and will bring many changes in the information and communications industry, in the media sector and in many other sectors that are not yet foreseeable. These changes will also include the way in which data and content are generated, distributed and received. Hence, it will only become clear in a few years' time whether new promising technologies such as virtual worlds or 5G Broadcast will be widely accepted by users and become established. At present, it is difficult to estimate the long-term demand for spectrum for wireless (mobile) electronic communication services (ECS) such as 6G because demand for spectrum suitable for wireless ECS derives directly from end-users and their usage.

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Therefore, spectrum could remain a critical growth factor and a barrier to expand for telecommunications operators. Whereby coverage bands (frequencies below 1 GHz) due to their propagation characteristics play an important role for the cost-efficient provision of broadband services in rural areas and thus the inclusion of the rural population into the digital society. While experts expect continued strong growth in transmitted data volumes over the next years (also in rural areas), it is currently not possible to make reliable forecasts beyond 2030 – and for this reason, TKK is convinced that it is currently too early to make robust predictions about the development of electronic communications, media and, possibly, other relevant services after 2030.<sup>1</sup> However, such predictions are also necessary in order to decide on the best possible use of the UHF band for society and the economy. In order to have a complete picture in the analysis, TKK suggests adding a long-term all-IP scenario in addition to the scenarios mentioned in the report.

Secondly, TKK advocates for a uniform and harmonized long-term use of the UHF band throughout Europe. Austria comprises a rather small area compared to other European countries. If one compares the spatial extent of Austria with the interference protection zones identified on page 13 of the RSPG report, which would be required if different services in Europe are used, it becomes clear that there is no alternative to a uniform and harmonized use of the UHF band throughout Europe, at least for smaller countries like Austria. TKK recognises the efforts of the RSPG to identify options for flexibility based on Art. 4 of the UHF Decision (Decision (EU) 2017/899), but considers the practical relevance to be rather limited, especially for small countries. The report raises problems and points out that there is no significant use of the flexibility option (e.g. on page 10). Apart from the interference issue there are also strong economic arguments for a harmonized use of spectrum. History has proven that communication technologies are only successful when economies of scale can be exploited at a very large scale.

Finally, TKK would like to see the RSPG continue to play a central role in this discussion. The RSPG has a high level of expertise, has a track record of excellent work and is best suited to incorporate the different situations in individual EU countries into a harmonised European approach. Spectrum is a valuable, scarce resource, especially frequencies below 1 GHz. Deciding on the best use of this resource for society is a major political challenge at national and international level and requires balancing different policy objectives. This should be preceded by a thorough long-term analysis of the benefits and (opportunity) costs of different uses. Given the pan-European perspective, this can best be done by the RSPG.

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<sup>1</sup> See Ericsson Mobility Report June 2023.



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Telekom-Control-Kommission

Susanne Lehr  
Vice-Chair

	
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