

ecta RESPONSE

**TO THE PUBLIC CONSULTATION BY
THE RADIO SPECTRUM POLICY
GROUP**

**ON DRAFT RSPG OPINION
“STRATEGY ON THE FUTURE USE
OF THE FREQUENCY BAND 470-694
MHZ BEYOND 2030 IN THE EU”**

31 JULY 2023

1. Introductory remarks and ecta considerations

1. ecta, the **European competitive telecommunications association**,¹ welcomes the opportunity to provide feedback on the public consultation regarding the draft RSPG opinion “*Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU*” (hereinafter “The Proposed Opinion” or “The Draft Opinion”).
2. ecta represents those alternative operators who, relying on the pro-competitive EU legal framework that has created a free market for electronic communications, have helped overcome national monopolies to give EU citizens, businesses and public administrations quality and choice at affordable prices. ecta represents at large those operators who are driving the development of an accessible Gigabit society, who represent significant investments in fixed, mobile and fixed wireless access networks that qualify as Very High Capacity Networks (hereinafter “VHCN”) and who demonstrate unique innovation capabilities. ecta counts Mobile Network Operators (hereafter ‘MNOs’), Fixed Wireless Access operators (hereafter ‘FWA operators’) as well as Mobile Virtual Network Operators (hereafter ‘MVNOs’) among its members.
3. ecta welcomes the RSPG’s initiative. However, as will be explained in detail in the following paragraphs, ecta considers the **Draft Opinion merely descriptive** on the current uses of the frequency band 470-694 MHz and how the market context has evolved since the publication of the RSPG15-595 FINAL Opinion (hereinafter “2015 RSPG Opinion on UHF band”) that regulated the 470-790 MHz UHF band. **The Draft Opinion does not contain any ambition on the future use of the band for mobile communications (neither by 2030 nor beyond 2030) and does not put forward any ideas or policy proposals for achieving it.** Paradoxically, it highlights: *“As it is expected that, until 2030, different Member States will remain in different situations regarding the usage of sub-700 MHz band, the conclusion of the RSPG subgroup is that a common path for all Member States seems difficult even after 2030, due to different national spectrum needs and cross border issues”* (ecta emphasis added). As such, the Draft Report is **highly disappointing: it seems to promote maintaining the status quo, which would imply the use of this highly precious low band for terrestrial broadcasting services also beyond 2030.** This is an outcome which is simply unacceptable and at odds with European Digital and Green transition objectives.
4. For the reasons that will be explained in the following paragraphs, ecta believes that **the most adequate and future-proof solution for the sub-700 MHz band use in Europe beyond 2030 would be a European harmonized decision on repurposing the sub-700 MHz band, or a portion thereof (e.g., the so-called band 71²), for bi-directional mobile use, based on the 600 MHz FDD band**

¹ <https://www.ectaportal.com/about-ecta>

² The band (663-698 UL and 617 655 DL).

plan, while allowing for the necessary flexibility for Member States in terms of different national timelines. Such flexibility should be provided by: i) granting short term licenses in order to allow easy refarming towards EU harmonization, and ii) foreseeing sufficiently large separation distances, taking into account the propagation characteristics of the low bands. Such a European decision could be facilitated by a future WRC-23 decision on AI 1.5 introducing a co-primary mobile allocation in the whole 470-694 MHz band in Region 1, or in its geographical areas by means of multi-Member States clusters so as to provide certainty and allow for early preparation of the market players for the new European situation post 2030, in order to ensure and increase planning security.

5. ecta considers that the final text of the RSPG's Draft Opinion should be structurally improved in a way to propose and promote:

- a. **for the period until 2030**, concrete solutions to immediately allow the flexibility to use the sub-700MHz band for mobile services for both Downlink and Uplink in Member States where this would be feasible³. This flexibility should be accompanied by appropriate safeguards allowing a future European harmonization. Such safeguards should include: i) granting licences for short term periods in order to allow easy refarming towards EU harmonization, and, ii) foreseeing sufficiently large separation distances taking into account the propagation characteristics of the low bands to avoid interferences. **The RSPG should take a position allowing the creation of clusters of "pioneer Member States" with similar characteristics in terms of band allocation** (those situated in channels 39-43 where the sub-700 MHz band equipment use is feasible) **and DTT usage** (those in which the DTT consumption shows a steady decrease) **where such use can effectively be implemented by respecting the rules in force**. This should be done, in ecta's opinion, shortly after WRC-23, so as to provide certainty and allow for early preparation of the market players for the new European situation post 2030.
- b. **for the period beyond 2030**, co-primary mobile allocation in the whole 470-694 MHz band. This should be promoted, in ecta's opinion, by the European Union in the WRC-23 that will shortly take place, by promoting a future WRC-23 decision on AI 1.5 introducing a co-primary mobile allocation in the whole 470-694 MHz band in Region 1. It should be followed by a European harmonized decision.

³ The Lamy Report already recommended that the regulation foreseeing a priority use of the 470-496 MHz band at least until 2030 should be reviewed in 2025. The RSPG opinion to result from this consultation, as well as WRC-23, can initiate the review.

1.1. ecta comments on the overview sections of the draft opinion

6. **ecta** notes that the Draft RSPG opinion primarily contains a merely descriptive and unambitious overview of:
 - a. the EU regulation concerning the current use of the frequency band 470-694 MHz, including an update regarding the implementation of recommendations provided by the 2015 RSPG Opinion on UHF band by the Member States.
 - b. the existing flexibility rules regarding the possible use of the sub-700 MHz band for any other use (i.e. mobile) than the terrestrial provision of broadcasting services, including free television, and wireless audio PMSE, on the basis of national needs. The current regulation states that such uses in this band are available at least until 2030.
 - c. the existing technical solutions fitting for the existing flexibility rules including their limits and opportunities.
 - d. the TV landscapes in EU Member States.
7. **All in all, ecta is extremely worried to see how this set of overviews feeds into RSPG conclusions and recommendations in the Draft Opinion which are totally unambitious and, if approved, would be at odds with the European 2030 Digital Targets.**
8. In relation to section 2.1. regarding *“Review of the background”* **ecta** notes that the draft Opinion, with respect to the European Parliament and Council Decision (EU) 2017/899 on “the use of the 470-790 MHz frequency band in the Union” (hereinafter “UHF Decision”) states, that *“Article 4 of the UHF Decision, the frequency band 470-694 MHz will continue, at least until 2030, to be available for the terrestrial provision of broadcasting services, including free television, and for use by wireless audio PMSE on the basis of national needs”*.
9. **ecta** agrees with this statement but would like to add that the UHF Decision of 2017 provided certainty to the market for the period until 2030 whilst granting flexibility to Member States based on art. 4 of the Decision. Now that seven years (half of the period addressed by this Decision) have passed, **it is important to recognize that the market also requires certainty for the future use of the UHF band in Europe beyond 2030.**
10. The Draft Opinion further reports *“To examine latest developments and trends that are relevant to the current and future use of the 470-694 MHz band, the EC performed a study on the use of the sub-700 MHz UHF band (470-694 MHz)”*. **ecta** notes that this study, by LS Telcom and VVA for the European Commission is favouring 5G broadcasting as a “promising alternative to DTT” and challenging the demand for

additional spectrum for IMT in the sub-1 GHz by stating: *“The majority of MS stated that they do not have sufficient information to comment on the likelihood of additional sub-1 GHz spectrum being required, potentially because the current focus for administrations is on making the 5G pioneer spectrum bands (700 MHz, 3.6 GHz and 26 GHz) available to operators.”*

11. ecta is extremely worried to see that this statement has fed into RSPG conclusions and recommendations in the Draft Opinion.

12. ecta wishes to highlight, by contrast, that the demand for additional spectrum including sub-700 MHz band for mobile communications is sharply increasing over time. This demand is real, also for overcoming competition deficiencies due to an imbalance of spectrum allocation⁴. RSPG must take into consideration that the UHF band offers the possibility of improving coverage in rural areas and thereby reducing the digital divide as well as providing enhanced indoor connectivity. Ensuring availability of broadband services was already highlighted in Decision (EU) 2017/899.

13. ecta underlines that there are strong technical motivations for sub-700 MHz band use by mobile services.

Firstly, in general, spectrum is a scarce resource and therefore, RSPG should promote a flexible use of spectrum, taking into account specific national circumstances, and to ensure it is used in the most efficient way. The Low-band spectrum and in particular sub 700 MHz, if efficiently used, has full potential to be the core band to ensure digital equality, digital inclusion and affordable connectivity across the Member States. In fact, the increased availability of sub-1GHz spectrum would significantly boost the capacity layer of MNOs networks. This is due to the fact that, according to a recent GSMA-Coleago study⁵, the additional capacity in 600 MHz would lead to improvements in rural and deep-indoor download speed from 30 to 50%. This is due to the fact that: *“low band spectrum has strong propagation characteristics for covering wide areas and penetrating deep into buildings. As such it is the delivery mechanism for rural broadband and making additional low-band available, such as the 600 MHz band, will drive digital inclusion and ensure rural / urban digital equality”*.

14. Secondly such flexible use, would be fully aligned with the green transition objectives set by the European Commission and confirmed and promoted by the European Union.

15. The use of sub-700 MHz for mobile services for both downlink and uplink, in addition to the low band spectrum available for mobile (700 MHz, 800 MHz, 900 MHz), would imply a lower number of mobile base stations needed, up to 33%

⁴ i.e. the German mobile services market characterized by an oligopoly of Telekom, Telefonica and Vodafone, resulting in disadvantages for a new entrant MNO, and as a result for the consumer.

⁵ Available [here](#)

less, by the MNOs to provide their mobile services. Especially in rural areas, the use of sub 700 MHz, would be fundamental to avoid having to increase the number of cell sites to increase performance, and to ensure digital equality. As stated by the GSMA-Coleago study: *“Additional low-band spectrum will help connect rural areas to better quality services by reducing the number of cell sites needed to reach the same level of performance. Today, operators typically aim to deliver at least 5 Mbit/s to 10 Mbit/s at the cell edge in rural areas, but this is expected to increase to 10 to 20 Mbps for 5G. Even with existing spectrum assets in other low bands, an additional 600 MHz spectrum will reduce the sites needed to provide 20 Mbps consistent coverage”*.

16. This, in turn would ensure a more sustainable business to the benefit of end-users and of the environment, in terms of lower energy consumption, less land occupation, lower EMF emissions, and reduced visual pollution.
17. It is important to highlight that the sub-700 MHz (600 MHz US FDD (Band n71, 2x35 MHz) has already been assigned for mobile services downlink and uplink and is successfully used in the US and Canada. It is in the 5G coverage band.
18. In relation to the Draft RSPG Opinion’s overview on the technical studies focusing on compatibility issues between digital terrestrial television broadcasting and terrestrial mobile broadband applications, including IMT, in the frequency band 470-694/698 MHz, **ecta** notes that the draft Opinion reports only two ITU studies (Report BT.2337-1 (11/20170) and Report BT.2301-3 (03/2021)) and makes no reference to the most recent ITU-R studies carried out in the framework of TG 6/1 work, which seems unbalanced. Several studies in the more recent ITU-R reports⁶ developed during the WRC-23 preparation have provided interesting results showing more manageable separation distances required between IMT deployments and DVB deployments.
19. With reference to the update regarding the implementation of recommendations provided by the 2015 RSPG Opinion on the UHF band by the Member States, **ecta** firstly observes, in relation to the recommendations 8-10, that as of today, as underlined by the Draft RSPG Opinion, no commercial WBB service in the sub-700 MHz portion of the UHF band has been launched, even though Article 4 of the UHF Decision formally allows such use.
20. **ecta** would like to emphasize that the main reason behind this fact lies in the technical restrictions coming from the need to protect the broadcasting usage within EU Member States as well as at their borders. However, **the existence of**

⁶ ITU-Report, Annex 3: “Review on sharing and compatibility studies in the frequency band 470-694 MHz taking into account the relevant ITU Radiocommunication Sector (ITU-R) Studies, Recommendations, and Report”, available [here](#)

such high technical restrictions strengthens and does not weaken the need for a coordinated UHF band repurposing action at the EU level.

21. In addition, **ecta** does not agree with the Draft Opinion when it classifies the recommendations 8-10 as fully implemented. Recommendations 8-10 providing a stable frequency framework for broadcasting and PMSE usages, and offering national flexible use of the sub-700 MHz for WBB, can hardly be seen as fully implemented insofar as no commercial WBB use of this portion of the UHF band has emerged in Europe between the years 2017 and 2023.
22. In relation to the Draft Opinion's overview of the current status of implementation of the flexibility rule under Art. 4 of the UHF Decision, the Draft Opinion states: *"Further to the regulatory aspect, flexibility under Article 4 has not yet been implemented at national level and therefore there is no experience at cross border level either. Trials (SDL, 5G Broadcast), described in Annex III, have been done at national level, in isolated locations but not all over the country"*. **ecta** considers that even though the "envelope concept" introduced in the GE-06 Agreement could facilitate the implementation of flexibility under Article 4, the absence of any example of such implementation in the EU market to date confirms the need to proceed to a coordinated UHF band repurposing action at the EU.
23. The Draft Opinion's overview of the existing technical solutions focuses, inter alia, on the Supplementary Downlink (SDL) implementation solutions. In relation to these solutions, **ecta** wishes to underline that in general, limiting the use of the sub-700 MHz band to the SDL option, at least as today and with the current technologies, would significantly reduce the potential of 5G and future IMT technologies. Only the **bi-directional mobile use** of the sub-700 MHz band could ensure the implementation of the EU policies related to digital equality, high-speed wireless broadband, affordable wide-area connectivity and deep indoor coverage. For instance, with the SDL limitation, use cases such as 5G-connected vehicles, 5G FWA to remote rural buildings, wide-area smart agriculture and cost-efficient 5G capacity solutions may not be possible. From the equipment perspective, no standardized solutions exist or are planned by 3GPP which include part of the 470-694 MHz band as an SDL band combined with another existing FDD band. **ecta** considers that this is a typical vicious cycle: the operators are not interested in a highly inefficient solution such as the Supplementary Downlink (SDL) implementation. Therefore, there is no demand to the vendors and there are no standardization efforts. In fact, there have been cases in which the SDL spectrum has been put to auction and it has not been awarded due to the lack of interest from the operators (see for instance the Italian 5G frequency auction⁷) This again confirms the need for a coordinated UHF band repurposing action at the EU level.
24. In relation to the 5G Broadcasting solution analysis, **ecta** agrees with the Draft Opinion when it states that *"5G Broadcast is an application of the Broadcast Service and therefore, in strictly regulatory terms, does not constitute an Article 4 case"*. **ecta** notes that the Draft Opinion, states that it *"is considered useful to describe it in this*

⁷ See the Italian 5G Auction result decision for 700 MHz SDL band [here](#)

section because it may become relevant, in the context of the possible uses of the 470-694 MHz band". ecta is worried with this approach as this indicates the will of the RSPG to encourage this use which is a broadcasting use and not WBB uses.

25. **ecta** firmly believes that a **European regulatory framework enabling the long-term use of the sub-700 MHz band for broadcasting service, even adapted to the GE-06 Plan "5G Broadcast" system complementing or replacing the existing DVB-T/DVB-T2 technologies, would contradict the need to respond to current clear market trends. These are: (i) a steady reduction of DTT consumption in Europe, (ii) the growing role of fixed broadband services in delivering video content (e.g. via OTTs' platforms, but also via broadcasters' streaming platforms), and (iii) growing demand for wireless broadband services (both mobile and fixed-wireless access), and iv) increasing mobile data consumption in EU Member States⁸ which triggers, inter alia, the need for additional spectrum.**
26. In relation to Dynamic Spectrum Access (white spaces)⁹, **ecta** agrees with the view of the Draft Opinion that a Dynamic Spectrum Access (white spaces) based regulatory framework, as described, has no commercial future in the sub-700 MHz in Europe.
27. Finally, in relation to the solution regarding *"Dedicated band for use by the mobile service with uplink - 600 MHz band plan implementation"*, **ecta** recognizes that exercising the flexibility afforded by Article 4 for a mobile frequency arrangement with uplink and downlink from technical and regulatory standpoints, is more complex than with mobile downlink only. However, **ecta** wishes to underline that, as stated by the Draft Opinion, as of today, no commercial WBB downlink service has been launched in any EU Member State even though Article 4 has been allowing for such a use since 2017. However, this does not show the absence of demand by the mobile sector for the use of sub-700 MHz band. It rather shows that the high level of technical restrictions imposed for allowing flexibility and inefficient technical solutions such as Supplementary Downlink (SDL), has so far created a vicious cycle for the use of sub-700 MHz band for mobile uses in Europe.
28. **ecta**, in order to contrast and break this vicious cycle, **recommends that the 600 MHz FDD band plan (UL 663 – 698 MHz, DL 617-652 MHz) – 3GPP Band 71/n71 ("US band plan") which already has a mature equipment ecosystem and is attracting more and more attention of countries within as well as outside ITU Region 1, is, to date, the most promising and future-proof solution to respond to the growing demand for mobile broadband in the sub-700 MHz band in the EU. The future WRC-23 decision on AI 1.5 potentially**

⁸ See for instance the Ericsson Mobile data traffic outlook, available [here](#) which shows a 19% CAGR between 2022 and 2028 for Western Europe (from 20 GB/month to 56 GB/month/smartphone) and a 18% CAGR in the same period for Eastern Europe (from 14 to 37 GB/month/smartphone).

⁹ See the section 3.3.4, page 13 of the Draft Opinion.

introducing a co-primary mobile allocation in the 470-694 MHz band in Region 1 would facilitate the implementation of this option in Europe.

29. In light of those considerations, [ecta](#), believes that the choice of the full FDD band plan in the sub-700 MHz band, such as the 600 MHz FDD band plan (UL 663 – 698 MHz, DL 617-652 MHz), appears to be an appropriate solution for the EU in line with the Europe’s 2030 Digital Connectivity Targets. It would fit into to the clear market trend of a steady reduction of DTT consumption and the growing demand from operators (including those with no or limited <1 GHz spectrum) to be able to launch mobile broadband services in the sub-700 MHz band in Europe. Finally, it would ensure in a timely manner, the required certainty to the European market for the period beyond 2030.
30. [ecta](#) acknowledges that the gradual introduction of the 600 MHz FDD band plan in the EU would require efforts from EU Member States, in partnership with their neighbours, to explore the possibilities of efficient introduction of this solution under Article 4 of the UHF Decision or under a future European regulatory framework which may be updated to reflect the decisions of WRC-23. [ecta](#) to such purpose suggests starting with the identification of those Member States which assigned channels 39-43 and which at the same time foresee limited DTT consumption, by forming “pioneer Member State clusters” for the use of sub-700 MHz (both downlink and uplink) for mobile uses. Naturally in those Member States, the flexibility should be accompanied by appropriate safeguards allowing a future European harmonization. Such safeguards should include: i) granting licenses for short term periods in order to allow easy refarming towards EU harmonization, and, ii) foreseeing sufficiently large separation distances taking into account the propagation characteristics of the low bands to avoid interferences.

1.2. [ecta](#) comments on possible & technically feasible scenarios - post 2030 and RSPG recommendations

31. The Draft Opinion provides possible and technically feasible national scenarios concerning development of use in the sub-700MHz frequency band (470-694 MHz), taking into consideration the current impact of the flexibility under applicable conditions, the current TV landscapes among EU countries, and the main drivers which may influence future developments.
32. In particular, it states “*In some Member States, since the rise of cable TV, DSL (IP TV) and later fibre optics, fixed broadband access has increased and is offering a possible alternative to DTT, under different access conditions. Such alternative subscription-based services offer various media contents through fixed broadband. In some cases (including Belgium, the Netherlands, Sweden, Finland and Malta), this has led to a decrease in the use of DTT*”. However, the Draft Opinion also underlines “*in other Member States the usage of free to air DTT is still very significant and in a large number of EU Member States there is no visibility on short term reduction of DTT spectrum needs, due to a number of factors (see Section 4.3.2, Scenario 1).*”

Representative cases are, for example, those of Spain, France, Poland and Croatia where, despite the extensive fibre optic fixed broadband network, DTT continues to be one of the most used platforms". Consequently, the RSPG draft Opinion concludes "The varying broadcasting needs between Member States beyond 2030 may result in significantly different scenarios (...)"

33. **ecta cannot agree with this conclusion.** The analysis of the Draft Opinion should have a forward looking approach and should not focus on the short term needs. In the medium term, it is more reasonable to expect more similarities across the EU Member States from the DTT spectrum needs' perspective, this is even the more in the period beyond 2030. **ecta** firmly believes that the broadcasting needs in the majority of EU countries would likely be satisfied already in short term, by using platforms other than DTT (i.e., the fixed, fixed-wireless and to some extent mobile VHC networks, which can support broadcast streaming, directly or via the internet). FTTH networks are increasingly the norm, and EU policy is to have 1 Gbit/s connectivity available to everyone by 2030. These networks will be key in satisfying the broadcasting needs across Europe. ecta hereby emphasizes that the costs of not taking greater account of mobile services are high for European citizens.
34. The Draft Opinion presents 3 different future scenarios: 1. Prevalent broadcasting; 2. Broadcasting (DTT and 5G Broadcast), Mobile limited (SDL); 3. Broadcasting limited, Mobile (Full FDD band plan).
35. **ecta** believes that the most credible scenario, to date, among those proposed, is scenario 3 which foresees, limited broadcasting and mobile (Full FDD Plan) in sub-700 MHz spectrum.
36. Scenario 1: "Prevalent broadcasting" has very little evidence of becoming the dominant one, based on the long-time observed trends in the European market (as is described in paragraphs 37 and 38). Therefore, it should not be considered in the development of the European regulatory framework for the sub-700 MHz band beyond 2030.
37. Scenario 2: "Broadcasting (5G and 5G Broadcast), Mobile limited (SDL)", should also be considered as less likely than scenario 3 since it could potentially lead to inefficient spectrum use of a very valuable portion of radio spectrum.
38. Conversely to what the Draft Opinion states, **ecta** considers that the spectrum need for broadcasters is expected to decrease over time due to the fact that the traffic is progressively moving to broadband networks. A recent GSMA report on the Use of the UHF band in Europe¹⁰, clearly shows that even though DTT is a resilient platform, its usage is decreasing. The Report arrives to such (correct) conclusions based on several elements of evidence: *"First, there is a large generation gap, with younger generations substituting live TV with other forms of*

¹⁰ Available [here](#)

audio-visual content (...). Secondly, UHF Digital Terrestrial Television broadcast is not the only means to distribute linear TV content efficiently. The channels offered through DTT are generally also available through cable-TV, IPTV or broadcast satellites across Europe, in many cases with additional value-added features such as time-shift. Third, premium sports live content is usually only available for pay-TV subscriptions, and not distributed as free-to-air over DTT. Fourth, some broadcasters are already making certain content and replays available on their on-demand platform only, thus reducing their number of linear channels. It must be borne in mind that just a very small number of linear DTT channels have a relatively high share of viewing. In Spain, for example, only 5 out of 25 national free-to-air channels have a share above 5%, and 15 have a share below 2%¹¹. Distributing “marginal” channels and content over the internet is becoming a very attractive alternative, particularly as the penetration of smart TVs and ultrafast broadband connections reaches critical mass”.

39. This is the case also in those Member States that have an important use of DTT technologies for broadcasting. For instance, in Italy, which is one of the most prominent DTT using Member States, DAZN, one of the biggest european internet streaming platforms, and Amazon Prime have been awarded the football rights for Serie A and UEFA Champions League. Also, there has been an important increase in the adoption of smart TVs connected to internet: in 2017, the Italian families using Smart TVs were 5,4 MLN, while as of end 2022 16,7 MLN families use Smart TVs¹²; finally SKY Italia, who is the prevalent pay TV platform in Italy has adopted new SKY Glass TV which is connected to a broadband network with content delivered over the internet.
40. In light of these considerations, and as regards the period beyond 2030, ecta considers that the implicit subsidy given to DTT through preferential access to spectrum will be hard to justify. In fact, the EU Digital Compass has clearly set as a connectivity objective of 1 Gigabit for everyone. The very high capacity networks that will enable this connectivity performance are costly to deploy and it is crucial to ensure demand by end-users for VHC networks, be it residential users or businesses. In this context, artificially sustaining DTT will hinder take-up of very high capacity broadband connectivity solutions that should be used to distribute audio-visual content in order to stimulate the demand from end-users.
41. ecta therefore believes that Scenario 3 “Broadcasting limited, Mobile (Full FDD band plan)” appears to date to be the most adequate and future-proof scenario in the sub-700 MHz band for Europe. The growing demand for wide-area mobile broadband services as well as other applications which could be most efficiently provided in lower frequency bands could be supported by implementation of the 600 MHz FDD band plan. **The most efficient solution for such an evolution of the sub-700 MHz band use in Europe would be a European harmonized decision on repurposing the sub-700 MHz band, or its portion, for bi-directional mobile use at a certain date, so as to provide certainty and allow for early preparation of the market players for the new European situation**

¹¹ Available [here](#)

¹² Censis report available [here](#)

post 2030. ecta wishes also to emphasize that the future spectrum demand for PMSE applications can be satisfied within as well as outside of the sub-700 MHz frequency bands which are harmonised for PMSE use.

2. ecta Concluding Remarks

29. In light of the observations, evidence and reflections provided above, ecta kindly invites the RSPG to significantly amend and improve the final text of its Opinion, and in particular:

- i. to include concrete and constructive ideas and policies as suggested by ecta for the future use of the sub-700 MHz band for mobile communications beyond 2030;
- ii. in relation to possible and technically feasible scenario for post 2030, by reporting the evidence on: (i) demand from mobile operators for the sub-700 MHz band, and on (ii) the declining trends in DTT usage that will become even the more marked in the medium term;
- iii. in relation to RSPG recommendations by proposing and promoting:
 - a. **for the period until 2030**, concrete solutions to immediately allow the flexibility to use the sub-700MHz band for mobile services for both Downlink and Uplink in Member States where this would be feasible. This flexibility should be accompanied by appropriate safeguards allowing a future European harmonization. Such safeguards should include: i) granting licenses for short term periods in order to allow easy refarming towards EU harmonization, and, ii) foreseeing sufficiently large separation distances taking into account the propagation characteristics of the low bands to avoid interferences. **The RSPG should take a position allowing the creation of “pioneer Member States” with similar characteristics in terms of band allocation** (those situated in channels 39-43 where the sub-700 MHz band equipment use is feasible) **and DTT usage** (those in which the DTT consumption shows a steady decrease) **where such use can effectively be implemented by respecting the rules in force**. This should be done, in ecta’s opinion, shortly after WRC-23, so as to provide certainty and allow for early preparation of the market players for the new European situation post 2030.
 - b. **for the period beyond 2030**, decide on co-primary mobile allocation in the whole 470-694 MHz band. This should be promoted, in ecta’s opinion,

by the European Union in the WRC-23 that will shortly take place, by promoting a future WRC-23 decision on AI 1.5 introducing a co-primary mobile allocation in the whole 470-694 MHz band in Region 1. It should be followed by a European harmonized decision.

In case of questions or requests for clarification regarding this contribution, the Radio Spectrum Policy Group is welcome to contact Mr Luc Hindryckx, [ecta](#) Director General, or Ms Pinar Serdengecti, [ecta](#) Regulation and Competition Affairs Director.