

To: RSPG Secretariat (via e-mail: INFSO-RSPG@ec.europa.eu)

Subject: **Response to “Draft RSPG Opinion on Cognitive Technologies”**

Your Ref: **RSPG10-348**

Introduction

The COST Action IC0905 “Techno-Economic Regulatory framework for Radio spectrum Access for Cognitive Radio/Software Defined Radio” (TERRA) is one of the R&D networking and coordination initiatives set up and run within the framework of COST. Action COST-TERRA was launched in May 2010 with the aim of coordinating national and international research relating to the establishment of a European techno-economic regulatory framework for Cognitive Radio/Software Defined Radio (CR/SDR). As of today, the membership of COST-TERRA includes researchers and practitioners from research institutions, industry and regulators in 17 European countries. Working relationships had been already established with CEPT/ECC, ETSI, IEEE SCC41 and Wireless Innovation Forum. Detailed information about our objectives, composition and work programme may be found at our website: <http://www.cost-terra.org/>.

The coordination activities shall be arranged in four Working Groups the names of which reflect the scope of their considered issues:

- WG1 "CR/SDR deployment scenarios";
- WG2 "CR/SDR co-existence studies";
- WG3 "Economic aspects of CR/SDR regulation";
- WG4 "Impact assessment of CR/SDR regulation".

It is planned to have 2-3 working meetings each year and carry out dissemination activities between the meetings. As this is very new Action, up to now there was just one working meeting held in August 2010, with the next meeting scheduled for 19-21 January 2011. The entire foreseen duration for the Action will be 4 years.

Comments to the draft RSPG Opinion

COST-TERRA welcomes the above referred RSPG consultation on the matter of introducing Cognitive Radio (CR) technologies in Europe and would like to respond by offering the following comments to some of the draft RSPG recommendations (quoted below in italics):

Recommend 2: that a platform shall be created to allow researchers, academia and regulators to coordinate research activities;

COST-TERRA response:

We support the notion of this recommendation and would like to draw your attention to the fact that the COST Action IC0905 TERRA (as well as Action IC0902, which was already identified by RSPG in their analysis) was established with exactly the same aim as stated in this RSPG recommendation. While IC0902 is focusing on research into CR technological base, the role of COST-TERRA is to contribute to the research in the area of CR regulatory policies.

The setting up of these two Actions through the grass-roots initiative from the researchers in the respective fields is in accordance with COST's philosophy of promoting “bottom-up” approach to coordination of European activities in the area of non-competitive research, pre-normative cooperation, and solving environmental, cross-border and public utility problems. Up to now this approach has been successfully used to maximise European synergy and added value in research cooperation and is a useful tool to further European integration.

Accordingly, in order to avoid that academia and regulators have to scatter their declining financial resources due to the necessity to attend to an ever-increasing number of fora having comparable purposes, we would like to suggest that the creation of the platform becomes a subsidiary option:

2. that, *in case no suitable European fora already in existence having equivalent functions can be identified*, a platform shall be created to allow researchers, academia and regulators to coordinate research activities;

Recommend 8: that in order to provide some confidence to all stakeholders, EC should investigate if JRC facilities can be made available to carry out proof of concept testing on CR devices supplied by industry.

COST-TERRA response:

We propose that this recommend be deleted as, at present time, its current vague formulation may lead to some confusion and misunderstanding, raising more questions than providing any clear direction. Below we describe some of those confusing points and questions.

First of all, the Recommend 8 might be seen as precursor that Europe is ready to go to device (type) approval regulation without the due debate, consideration, etc. Secondly, it is not clear what JRC facilities would be? In fact, what such facilities would be even if it were not JRC: i.e. issues like measurement equipment, space, public demonstrations?

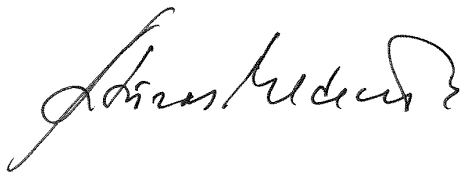
In that regard it may be also noted that JRC itself probably could not work as a sort of testing or certification agency, so the next question is what this proof of concept testing would be accomplishing? Would this be mandatory? How it would increase confidence of stakeholders? Why only devices from the industry - this alone would presume the industrial level of consensus forming that implies approval, regulation, etc. - regardless if it has legal regulation or binding form or not.

We therefore are of the opinion that the introduction of any single body whether it be at the national or Union level to provide technical coordination, proof of concept testing, or similar vaguely defined functionalities seems to be premature. The recommendation to involve JRC, or indeed any body endorsed by the European Commission or RSPG, should be specific enough that its future consequences can be estimated and directly debated at the national level and by different stakeholders at large.

Accordingly, we would like to propose a complete removal of the Recommend 8 until its more specific meaning, well debated and understood by all, could be found:

~~*Recommend 8: that in order to provide some confidence to all stakeholders, EC should investigate if JRC facilities can be made available to carry out proof of concept testing on CR devices supplied by industry.*~~

We thank you for the kind consideration of our comments and remain
Faithfully yours,



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