

Orange France Telecom Group response to the Radio Spectrum Policy Group of the draft RSPG opinion on “COMMON POLICY OBJECTIVES FOR WRC-12”

15 January 2011

Orange welcomes the opportunity to share some views with the Radio Spectrum Policy Group on the Common Policy Objectives for WRC-12. In addition, Orange thanks all the national and EU administrations, which are members of RSPG for their interest in WRC-12 issues in general and for the consultation on the Common Policy Objectives.

1- General Remarks

Orange would like to stress that the holding of dedicated workshops at European level, jointly organised by EC and CEPT, as a means to develop common views should be encouraged. Orange believes that inter-regional coordination will increase the chances of a successful outcome at future WRCs.

2- European Common Position

The extensive preparation process that leads to an European Common Position (ECP) has demonstrated its consistency and is appropriate to achieve consensus and to include views of the minority. As a result, the usual commitment of the CEPT members to the ECP is satisfactory.

It is therefore of great importance that representatives from the European Commission participate to the different meetings. Support of European Union representatives to the underlying policy principles during this process should help to promote the positions expressed in the European Common Proposals for the benefits of the European Union countries.

Orange encourages the holding of dedicated workshops at European level, jointly organised by EC and CEPT, as a means to develop common views. Orange also notes the increased importance of RSPG and believes that any procedural updates should be included in the new regulatory framework to further ensure the promotion of EU interests and facilitate the broad acceptance of the ECP. Furthermore, the valuable participation of industry representatives to the process should be promoted.

3- Main themes of WRC-12 of interest for EU-Wide support

Some agenda items at WRC-12 could potentially have a significant positive impact on common European policies and on important pan-European industrial sectors.

a. Information society – Electronic Communications

i. Agenda Item 1.17

In the preparation of the Agenda Item 1.17 in WRC-12, Orange supports actions from the European Commission for not placing undue constraints to the introduction of mobile services



in the band 790-862 MHz, not only in countries that have already open this flexibility but also in countries having borders with others that are not part of the European Union.

Orange believes that European Commission should further increase coordination between the EU and neighbouring countries, especially on the regulatory provisions which address the coexistence between mobile and aeronautical radionavigation services in order to facilitate the deployment of mobile service.

Finally, it is particularly important that the European Commission favours coordination of regulatory measures by encouraging the inclusion of maximum of countries in the footnote 5.316A of the ITU Radio Regulations.

ii. Agenda Item 8.2

Orange believes it is necessary to address the allocation of additional spectrum to the mobile service at the next WRC. While these new identifications adopted at WRC-07 have been helpful in fulfilling the initial spectrum requirements for IMT systems, the total amount of frequency bands identified for IMT is still insufficient compared to the spectrum requirements for IMT for the year 2020 which have been predicted in Report ITU-R M.2078 developed prior to WRC-07.

The rationales for additional spectrum are supported by

- 1) The fact that demands for cellular phones are still notably growing in a world-wide basis.
- 2) The increase of mobile data traffic volume in recent years is remarkable and expected to exceed the estimation performed in the ITU-R study prior to WRC-07,
- 3) A lot of mobile operators and vendors indicate their views that much wider frequency bandwidth will be required from the expectations on the future data traffic demand, however the frequency bands currently available for IMT will be insufficient in 2015-2020 to satisfy such demand.

In addition, it should be noted that, some of the frequency bands newly identified for IMT were not globally harmonized, although the globally harmonized spectrum for IMT, to the extent possible, is desirable for the realization of global roaming, the reduction of the overall cost of IMT networks and terminals by providing economies of scale, and the facilitation of global IMT deployment.

iii. Agenda Item 1.18

CEPT proposed and drove this issue for inclusion on the WRC-12 agenda item 1.18 at the request of the European Galileo system supported by the European Commission. It is intended to facilitate new navigation signals for next generation Galileo in a frequency band, which because of its proximity to mobile service allocations above 2.5 GHz, may offer attractive synergies with terrestrial mobile systems due to improved antenna efficiencies and use of shared hardware not possible with other Radio Navigation Satellite Service (RNSS) bands. Radio Determination Satellite Service (RDSS) space to Earth allocations usually have a corresponding Earth to space allocation to enable two-way radio determination. In Region 2 and 3 the paired uplink is at 1.6 GHz. However, there is no requirement for an Earth to space allocation linked to this agenda item and Galileo and CEPT does not seek one. RNSS is a subset of RDSS and Galileo would plan to use the global RDSS allocation at 2.5 GHz in effect as an RNSS allocation (note RNSS is a subset of RDSS in the Radio Regulations).

Orange considers that any modification to the RR as a consequence of A.I. 1.18 should not place undue constraints on IMT systems in the adjacent bands. In addition, Orange supports that a pfd value per RNSS satellite needs to be carefully addressed to ensure IMT applications using UMTS, LTE 10MHz or LTE 20MHz in the adjacent band would not suffer from any interference.

b. Introduction of more flexibility in the international regulatory framework

i. Agenda Item 1.2

Orange welcomes the studies initiated in the AI 1.2 to clarify whether the current international framework can adequately meet the changing requirements in the radiocommunication spectrum and allow the implementation of new and changing technologies in a timely manner. Especially when new technologies (for example the impact of cognitive radio under AI 1.19 and underlay systems for short-range services under AI 1.22) will be available, it will be key to have the appropriate regulatory framework to continue to operate efficient electronic communication networks.

The European Commission should encourage Member States to emphasise the view that provisions of Radio Regulations should be utilised not only to protect existing services but also to facilitate the introduction of current, emerging and future radio applications taking into account the digital convergence trend.

ii. Agenda Item 1.19

Considering the cognitive radio aspects, WRC-07 included the agenda item 1.19 into WRC-12 Agenda based on the proposals made by CEPT and Arab States. Agenda item 1.19 deals with the consideration of regulatory measures to facilitate the introduction of software-defined radio and cognitive radio systems.

Orange encourages the RSPG to carefully assess all aspects related to cognitive radio systems and supports that Software-defined radio and cognitive radio system should not be considered radio services as listed in Article 1 of the Radio Regulations but ITU-R Recommendations could be considered to detail CRS. Finally, Orange gives preference to the development of Resolution to provide guidance on future studies related to Cognitive Radio System at the ITU-R.

c. Protection of fixed links

i. Agenda Item 1.20

The 6.5GHz (6.425 – 7.110 GHz) fixed service channelling follows the band plan 6B ITU-R F Rec 384-7 and the ERC REC 14-02 and is heavily used for mobile backhauling. The RSPG should carefully consider the importance of the mobile backhauling based on microwave links (Fixed Services) and it remains essential to ensure appropriate protection of existing services.

ii. Agenda Item 1.12

The 37-39.5 GHz band plan is referenced in recommendations ITU-R 749-2 and ERC REC 12-01 and Orange would like to highlight the constant increasing usage of this band. As a necessity, the European Commission should encourage Member States to consider this band as essential for backhauling operations.

iii. Agenda Item 1.13

Orange supports that interim provision for Broadcasting Satellite Service (BSS) allocation in 22.4-22 GHz should be rendered definitive.

Regarding the need to allocate specific frequency band(s) for feeder link of the BSS in Regions 1 and 3., there are some views highlighting that the band 24.65-25.25 GHz should be allocated to the FSS for providing BSS feeder links. However, the band 24.65-25.25 GHz is used in Region 1 for both digital point-to-point and point-to-multipoint links in the Fixed Service allocation and remains essential to ensure appropriate protection of existing services.