

**ESOA COMMENTS ON**  
**DRAFT RSPG OPINION ON**  
**COMMON POLICY OBJECTIVES FOR WRC-12**

Dear Sir / Madam,

Please find below ESOA's comments on the draft RSPG Opinion.

Section 4.1 (Main items on EU policies):

AI 8.2

- ESOA would like to propose the following amendments on the RSPG draft text, considering the 'Broadband For All' objective that is part of the European Digital Agenda and the need to be technology neutral:

"The Digital Agenda within Europe's strategy 2020 calls that all EU citizens should have access to broadband at sufficient speed **including in remote and sparsely populated areas**. This cannot be achieved without a significant role being played by wireless broadband **(terrestrial and satellite)** networks and their spectrum resources should be able to cope with the expected growth of data traffic **and geographical coverage**. Therefore, Member States should support agenda item(s) for WRC-16 addressing the allocation and/or further harmonisation of spectrum, as appropriate, to meet this need."

Section 5.2 (Transport Policy):

AI 1.3

- ESOA considers that access to spectrum for satellite links should preferably be met using generic MSS (for the link between the UA and the satellite) and MSS/FSS spectrum (for the link between the satellite and the control station).

AI 1.7

- ESOA agrees that operators of AMS(R)S networks should be guaranteed priority access to their required spectrum as specified in N° 5.357A. It is felt, however, that the current provisions are expected to remain adequate with no or minor changes.

Section 5.4 (Introducing more flexibility):

AI 1.2

- After careful evaluation of the situation, ESOA considers that the existing level of flexibility in allocating spectrum is globally adequate. The proposal to create a permanent WRC agenda item would increase too much the complexity of a process that is already complex.
- On terrestrial convergence, ESOA has concerns about the impact it could have in bands shared with satellite services, as it may increase the risk of interference and of constraints on the development of new satellite services.

We remain at your disposal for any further information you may require.

Sincerely,



Aarti Holla-Maini, Secretary General