Telecom Italia response to draft RSPG opinion on "Common Policy Objectives for WRC-12" (RSPG 10-350 Draft)

15th January 2011

Introduction - Relevant Community Policy for WRC-12

Telecom Italia welcomes the Radio Spectrum Policy Group invitation to express comments and views in relation to the draft RSPG Opinion on Common Policy Objectives for WRC-12.

Telecom Italia completely agrees with the necessity to individuate as early as possible the main themes of WRC-12 which are of particular interest for the EU policies.

Telecom Italia also points out that this document should be a common policy objective reference not only for Member States and the European Commission, but also for the whole European industry.

Taking into account that the transposition, by member states, of the 2009 EU regulatory framework for electronic communications networks and services is ongoing, it's important that there is coordination at EU level on the spectrum issues for the preparation of WRC-12. Many several agenda items are addressing spectrum policies which are of interest of EU such as broadcasting, communications, sustainable transport and mobility, weather forecasting, monitoring of environmental changes, and responses to emergencies.

After the transposition of the new EU regulatory framework, the new spectrum principles and rules will be applied in the by member States, in accordance with feasibility analysis carried out by CEPT and ITU.

Nevertheless the sole European legislation is not sufficient to guarantee the well functioning of systems deployed near the borders between EU and not EU countries. Therefore, in order to avoid interferences problems and facilitate the right operation of the services at EU borders, cross border issues should be addressed in WRC-12.

Main items in regard to EU policies

Information society – Electronic Communications

Digital Dividend

We completely agree that Digital Dividend issue is particularly relevant for the EU, and that member States should work to ensure that no decision at WRC-12 would impede the possibility to deploy wireless broadband access networks in the DD frequency band.

Future agenda items on new spectrum for electronic communication services

Telecom Italia supports to put an agenda item for WRC-16 addressing the allocation of new spectrum to mobile services as a tool to cope with the objectives of the European Digital Agenda.

The availability of new suitable spectrum will lower the cost of deploying mobile networks allowing the delivery of mobile broadband services to rural areas and helping to deliver broadband for all.

Mobile Satellite services

An adequate international regulatory framework for satellite radio communication is important to guarantee an interference-controlled environment. We agree that allocations to the mobile satellite service may be a key in facilitating the development of new space services and in providing new access platforms for the delivery of electronic communication services.

Nevertheless, possible additional allocations of spectrum to the mobile-satellite services should be considered only if it is justified and if it does not unduly constrain the other existing, planned and future radio services.

Introduction of more flexibility in the international regulatory framework

Flexibility in allocating frequency bands to services while ensuring the protection of services operated in other countries is considered by Telecom Italia as an important issue. First of all, it should be assessed whether the current international regulatory framework has the right level of flexibility as required by the European objectives and whether the flexibility of European regulatory framework is compliant with the provisions of the ITU Radio Regulations, i.e. regarding the Software Defined Radio and Cognitive Radio Systems, where a global harmonisation is fundamental.

It is fundamental that any provision regarding flexibility take into account the necessity to avoid undue interferences which requires complex and expensive technical solutions (i.e. interference filtering); moreover, investments made by the operators for the assignment of frequency resources must be preserved.

Cognitive Radio Systems

Regulatory measures to enable the introduction of Software Defined Radio and Cognitive Radio Systems are of the utmost relevance. The knowledge of the potentialities of such systems is important and we are of the opinion that a set of technical and regulatory studies is needed to further investigate this topic.

As frequency bands for specific applications can be harmonised regionally by regional telecommunications organizations or on world wide basis in ITU-R Recommendations developed and approved, further investigations on the possible regulatory measures for the application of Cognitive Radio Systems and of Software Defined Radio are needed.

Short-range devices (SRD)

We think that the regulations of emissions by SRDs can be achieved via the development of ITU-R Recommendations, and consequently we think it is not necessary to take a decision on SRDs in WRC-12.

In any case, studies on emissions inside and outside ISM bands and on the effects of short-range devices on radio communication services are needed before taking any decision on this issue.

Other Items

Safety systems for ships and ports (agenda item 1.10)

We think that there is no need to make any regulatory and/or allocation changes on frequency allocation with regard to operation of safety systems for ships and ports.

Changes to the Radio Regulations, and in particular to the spectrum allocation tables, are not considered to be necessary in order to ensure the introduction of new technologies for safety and security of ships and ports.

Any study on the issue could be made when the spectrum needs will be proven.

Mobile Communication services on board Vessels (MCV)

Considering the international nature of the MCV service offered on vessels that can cross the territorial waters of different countries (also not EU), cross borders issues for MCV should be addressed in WRC-12.

Any study on the issue should aim at avoiding interferences between MCV and land based networks and at guaranteeing the right functioning of the services even when they are offered on the borders of different countries. Therefore an international Regulation by ITU on the matter is needed.