

## ETNO Reflection Document in reply to the public consultation on the Draft RSPG opinion on Common Policy Objectives for WRC-12



January 2011

### Executive Summary

In general ETNO supports the views expressed in the draft RSPG opinion but wishes to express the following observations:

The WRCs (World Radiocommunications Conferences) of the ITU-R and their decisions are of great importance for the mobile industry. Therefore, as in the past, ETNO agrees with the necessity to identify as early as possible the main agenda items of upcoming WRCs, particularly where of interest for EU policies.

In particular, among the WRC-12 Agenda Items, the most important from the operators' point of view are:

- Agenda Item 1.17: the ITU regulation should not place undue constraints to the development of broadband networks at the EU borders.
- Agenda Item 1.2: a more flexible international regulatory approach is possible as long as it does not conflict with the objective of world-wide harmonisation and interference free operation of Electronic Communication Networks. The harmonisation requirements of these networks must be preserved.
- Agenda item 1.19: the introduction of new "cognitive" devices requires the regulatory studies to be performed before any change in the Radio Regulations is decided.

## Introduction

ETNO 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. ETNO supports the general views expressed by the RSPG.

The WRCs (World Radiocommunications Conferences) of the ITU-R and their decisions are of great importance for the mobile industry. Therefore ETNO agrees with the necessity to identify as early as possible the main agenda items of WRCs which are of particular interest for the EU policies, in a similar way to what happened for the previous WRCs.

## Main Items

### Information society – Electronic Communications

ETNO agrees that the Digital Dividend issue is particularly relevant for the EU, and that the EU may work to ensure that no decision at WRC-12 would impede the harmonised deployment of mobile and fixed networks in this frequency band.

ETNO already expressed its position on the Digital Dividend to RSPG in its reply to the relevant consultation.

Agenda Item 1.17 is an important agenda item of the WRC-12 for the telecommunications industry. It deals with the review of the WRC-07 decision to allocate a sub-band of the digital dividend to mobile services (790-862 MHz). It is important that the sharing conditions defined under this agenda item allow the deployment of LTE networks at the borders of the European Union.

Agenda item 8.2 (agenda of the WRC-16) should include studies for the allocation of additional spectrum to the mobile service at WRC-16. At WRC-07 it was not possible to allocate a significant portion of world-wide harmonised spectrum for the demand of mobile future generations (e.g. 4G, etc.) which is intended to deliver data rates of up to 1 Gbit/s for nomadic use. 392 MHz of IMT spectrum were identified at WRC-07. This is only 30% of the ITU-R estimated need for additional IMT spectrum. As it was rejected to address this issue again at WRC-12, the objective is to put a corresponding agenda item on the agenda for the WRC-16.

### Flexibility and cognitive radio

ETNO welcomes the studies under agenda item 1.2 on a more flexible international regulatory approach as long as they do not conflict with the objective of world-wide harmonisation and interference free

operation of Electronic Communication Networks. The harmonisation requirement of these networks must be preserved.

The approach for other applications and services, where a flexible approach could be more beneficial, could be different - in particular referring to modern sharing technologies addressed under Agenda item 1.19 (e. g. cognitive radio). These anyway still require detailed regulatory studies to be performed before any change in the Radio Regulation is decided.

#### **Short-range devices**

Short range devices (agenda item 1.22) are devices using low power levels. However these appliances will be ubiquitous due to their high number. Therefore the aggregated emission of SRDs could be significant. While the European regulation provides an appropriate framework for SRD deployment, ETNO believes that harmonisation of emissions by SRDs can be achieved based on appropriate ITU-R Recommendations and reports, and consequently ETNO believes that there's no the need for WRC-12 to take a decision on SRDs

In any case, studies on emissions inside and outside ISM bands and effects on radio communication services of emissions from short-range devices are needed before any decision is taken regarding this issue

#### **Mobile Satellite services**

Possible additional allocations of spectrum to the mobile-satellite services is to be considered only if justified and without unduly constraining existing, planned and future radio applications operated in the existing services.

#### **Safety systems for ships and ports**

ETNO believes that there is no need for any regulatory and / or allocation changes to be made at WRC-12 regarding frequency allocation to the operation of safety systems for ships and ports and the related regulatory provisions.

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

Any study on the issue could be conducted when the spectrum requirements would be proven.

#### **Opinion of RSPG**

ETNO completely agrees that modifying the Radio Regulations by World Radio Conferences is the final step of a process of consensus among the ITU Member States in order to preserve access to spectrum and orbit resources in all parts of the world without harmful interference, and to give to industry the necessary stability and

predictability regarding the rules to be adopted in developing new services.

Consequently, we agree that Countries participating to WRCs should already reach an agreement on the main issues, during the preparatory period in between two conferences.

In this scope, coordination among European Countries is a key element, and European Common Proposals (ECPs) represent the basis to ensure consensus where possible. This avoids multiple proposals by different European countries and gives more strength to European position in order to be shared with other regional Groups and ultimately approved by the Conference.

Therefore, we support that the European coordinator on each agenda item should be selected from a country having co-signed the corresponding ECP, since it ensures that CEPT views will be promoted by the best person in terms of expertise and motivation.

To realise the objectives stated above, it is of prime importance for the European Union to identify early in the WRC process, the relevant policy objectives and associated priorities, in order to facilitate the involvement of the political level at the earliest possible stage.

Therefore, ETNO supports the proposal of RSPG to develop and adopt an opinion for each WRC theme, proposing to the European Parliament, the EU Council and the European Commission “Common Policy Objectives” for the corresponding conference.

Nevertheless, possible multi-annual spectrum policy programmes to be developed and adopted at EU level, addressing policy issues related to WRC agenda items and providing guidance on strategic objectives, should take particularities of Countries into account along with the need for harmonization at European level. This should in particular protect investments when deciding on flexible allocations of spectrum resources.

Finally, we agree that the EU and CEPT should give more emphasis on WRC decisions which facilitate coordination at EU borders.