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**GSMA Europe response to the RSPG opinion on
“COMMON POLICY OBJECTIVES FOR WRC-12”**

14 January 2011

GSMA Europe would like to thank the Radio Spectrum Policy Group (RSPG) for giving stakeholders the opportunity to comment on their draft Opinion on “Common policy objectives for the 2012 World Radiocommunications Conference (WRC-12)”.

In response to the public consultation, we would like to make the following points:

- 1. GSMA Europe supports the proposal that Member States should ensure that WRC-12 decisions will not impede the deployment of mobile networks in this frequency band;**
- 2. GSMA Europe also fully supports the proposal in the draft revised RSPG Opinion on WRC-12 that Member States should support an Agenda Item for WRC-16 addressing the allocation and further harmonisation of spectrum, as appropriate, to meet this need.**

Arguments underpinning this point are detailed overleaf.

Please do not hesitate to contact us if you have any questions.

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About GSMA Europe

The GSMA represents the interests of the worldwide mobile communications industry. Spanning 219 countries, the GSMA unites nearly 800 of the world's mobile operators, as well as more than 200 companies in the broader mobile ecosystem, including handset makers, software companies, equipment providers, internet companies, and media and entertainment organisations. The GSMA is focused on innovating, incubating and creating new opportunities for its membership, all with the end goal of driving the growth of the mobile communications industry. In the European Union the GSMA represents over 100 operators providing more than 600 million subscriber connections across the region. For more information on GSMA, please visit: Mobile World Live, the new online portal for the mobile communications industry, at www.mobileworldlive.com, GSMA corporate website at www.gsmworld.com, and GSMA Europe at www.gsmeurope.org.



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General Remarks

The World Radiocommunication Conferences (WRCs) of the ITU and its decisions are of utmost importance for the mobile industry. As a worldwide institution it should focus on worldwide-harmonised solutions as much as possible in order to maintain its position towards regional institutions. Harmonised global allocations enable economies of scale, which are of particular importance to future IMT mobile services.

GSMA Europe would like to thank the Radio Spectrum Policy Group (RSPG) for giving stakeholders the opportunity to comment on their draft Opinion on common policy objectives for the 2012 World Radiocommunication Conference (WRC-12). As we noted in our July 2009 response to the public consultation on the draft RSPG Opinion on WRCs (regarding both the preparatory process for ITU World Radio communication Conferences and the main themes of WRC-11 [sic] of interest for EU-wide support), assignment of a certain agenda item to a certain community policy does not mean that there is no relevance to another community policy. For example agenda item 1.4 deals with new allocations to the aeronautical mobile service (under "Transport Policy"), but could have an impact on the mobile service below 960 MHz (which clearly belongs to the section "Electronic Communications" policy area). Due to the dense allocations to different services in several frequency ranges there is often an interrelation between different radio services. This could lead to a situation where an Agenda Item is in support of a certain community policy but simultaneously hampering another community policy.

In this response GSMA Europe focuses on the two most important Agenda Items relating to Electronic Communications Services (ECS) policy, but nevertheless confirm that our views regarding other Agenda Items and policy areas remain as stated in our 2009 response to the RSPG consultation on WRCs.

Common Policy Objectives – Electronic Communications

As GSMA Europe noted in our response to the RSPG consultation on WRCs, Agenda Item **1.17** is one of the most important agenda items at WRC-12 for the mobile industry as it deals with sharing studies between the mobile service and other services in the band 790 – 862 MHz in Regions 1 and 3.

- Cross-border coordination between mobile service and broadcasting service in neighbouring countries:
GSMA Europe favours NOC (no change) in the Radio Regulations concerning this issue. The switchover to digital broadcasting will lead to a more efficient use of the radio spectrum, but will also result in a more productive use of the Digital Dividend through the use of the 800MHz sub-band for the provision of electronic communication services (ECS) other than broadcasting. It is important for the mobile industry that no additional constraints are imposed on the use of the mobile service in this band. Moreover, the EU should continue with its efforts to harmonise the use of the 800MHz sub-band in Europe for the mobile service.
- Cross-border coordination between mobile service and aeronautical radionavigation service:



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GSMA Europe thinks that new regulatory provisions are required which will ensure equitable access between mobile service and aeronautical radionavigation service.

GSMA Europe supports the proposal that Member States should ensure that WRC-12 decisions will not impede the deployment of mobile networks in this frequency band.

Regarding Agenda Item **8.2** (agenda for the next WRC) GSMA Europe believes it is necessary to address the allocation of additional spectrum to the mobile service at WRC-16. As previously stated, the GSMA believes that the ITU and WRC's play a vital role in helping to ensure that spectrum is harmonised to the extent required to control radio interference and allow for economies of scale to be realised by the industry. Such economies of scale have allowed GSM to go from a niche product to nearly 4.5 billion GSM and 3GSM connections in 20 years.

The need for such widespread international harmonisation has meant that the process of acquiring such harmonised spectrum needs long term planning. For example the core 3G/IMT (UMTS in Europe) was identified by the ITU World Administrative Radio Conference in 1992, and was finally awarded in around the year 2000 and fully available around the year 2004. This means that it is important to ensure that the planning process for identifying such spectrum takes place in good time, to allow for such long time horizons. Identification of bands by a WRC does not guarantee that frequency arrangements (band plans) will be the same between different ITU regions or that there will not be different regulatory restrictions and timings, even though the benefits of such international harmonisation can be very great for mass market services such as mobile. Nevertheless, WRC identifications do go a long way to giving industry confidence to develop products and help create the markets that will persuade administrations to implement what has been recommended.

The GSMA therefore welcomed the outcome of WRC-07 but have proposed to continue the work that could not be finished by WRC-07 in order to maximise the degree of harmonisation of the frequency bands identified for IMT. The earliest point in time for this work is at WRC-16. With this in mind, the GSMA has thought about the Agenda Items that will be required at WRC-16. For a discussion to take place at WRC-16, it is necessary to define a proper Agenda Item during the preparation for WRC-12. The debate about agenda items for WRC-16 has started, and the GSMA has proposed that WRC-12 (under agenda item 8.2) should request that at WRC-16, the following should be made an agenda item, namely:

“To consider the frequency bands identified for IMT with a view to rationalising, consolidating, and expanding these as appropriate, with the objective of achieving internationally harmonised bands, preferably on a global basis.”

Such an agenda item would give WRC-16 the flexibility it would require to ensure the best outcome for consumers and the most efficient use of the scarce spectrum resource.

GSMA Europe therefore also fully supports the proposal in the draft revised RSPG Opinion on WRC-12 that Member States should support an Agenda Item for WRC-16 addressing the allocation and further harmonisation of spectrum, as appropriate, to meet this need, and we offer our specific proposal for their consideration.