

Orange France Telecom Group response to the public consultation on RSPG Opinion in preparation for the radio spectrum policy programme (RSPP).

Orange welcomes the opportunity of this public consultation to express its views on the radio spectrum policy program which will establish guidelines for the European spectrum regulation activity in the coming years. The procedure established by the electronic communications regulatory framework concerning strategic planning and coordination of spectrum policies in the EU should enhance the decision process and provide better regulatory certainty to operators. Orange appreciates the role of the European Commission and RSPG for that purpose.

While the radio spectrum policy program is intended to cover a four to five years period, Orange believes that a long term vision extending to at least 2020 is necessary to develop a consistent strategy.

Orange agrees with the general directions defined by the RSPG opinion on the radio spectrum policy program and shares the view that the development of a consistent and coordinated spectrum regulation for electronic communication within the EU is essential considering the importance of ICT and wireless broadband on the economic growth, jobs and competitiveness of the EU economy.

Considering spectrum policy objectives which are proposed by the RSPG opinion, Orange would like to propose comments on the following issues:

Need for additional spectrum for electronic communications

Orange appreciates the efforts made by the EC in harmonising spectrum usage and allocation for new broadband mobile technologies and for making more flexible the usage of radiofrequencies.

The new spectrum bands (800 MHz band, 2.6 GHz band) expected to be awarded in the near future would provide operators additional resources for further development of their networks in order to respond to customers' demand in the near to medium term.

It should however be noted, considering the channel widths required for broadband services provision, that the limited amount of spectrum (2 x 30 MHz) available in the 800 MHz band already appears to be insufficient in a competing environment.

Transition from analog to digital broadcasting already allows a tremendous increase in the number of video channels available to the public. A coordinated move to more efficient technologies (MPEG-4, DVB-T2) would help terrestrial video



broadcasting to accommodate further service evolutions (HD, local channels...) in a reduced amount of spectrum, making possible further refarming of part of the band to the benefit of broadband wireless communications.

A co-primary mobile allocation covering the whole 470-790 MHz frequency range, submitted to WRC-16, would provide flexibility for further evolutions in the use of the band.

For the longer term, taking into account the time needed for spectrum allocations, further possible spectrum availability should be considered soon in order to avoid spectrum shortage. Other regions in the world are already taking aggressive steps to increase commercial mobile spectrum allocations. For example, the U.S. National Broadband Plan, approved recently, recommends making 500 MHz of spectrum newly available for broadband by 2020, with a benchmark of making 300 MHz available by 2015.

The agenda of WRC-16 should be established accordingly.

Spectrum liberalisation and efficient use of spectrum

Considering the benefits of spectrum usage harmonisation, Orange believes that technology and service neutrality implementation should be limited to relevant electronic communication technologies. The refarming of 2G mobile bands would provide good guidelines in that respect. Moreover, experience gained from the implementation of currently proposed "Bloc Edge Masks" should be carefully considered before extending the method to new frequency bands.

Improving radio receivers parameters such as sensitivity, adjacent channel selectivity or blocking could also significantly increase the environment friendliness of radioequipment by allowing a reduction of transmitters power and helping to address complex interference issues.

Availability of 800 MHz band in the European Union

Actions aiming to coordinate and accelerate the implementation of wireless broadband networks in the 791-862 MHz frequency band in the various member states would help to ensure the widest coverage to EU citizen and business. In addition, development of technical and standardisation measures to improve the broadcasting receiver performance would help to adress compatibility difficulties with broadcasting networks which are not taken into account by the current regulation.

Appropriate support would be provided to Members States in negotiations on compatibility or planning issues with neighbouring countries.

Relations between EC, CEPT and ETSI and policy coordination

As already expressed in its response to the Public consultation on the "draft Radio Spectrum Policy Group Opinion on Streamlining the regulatory environment for the use of spectrum", Orange FT considers that the co-operation between CEPT/ECC and RSCOM on the one hand, ETSI and TCAM on the other hand is essential for the definition of a consistent spectrum/radio-equipment regulation in Europe.



Concerning preparation of WRCs, Orange considers that CEPT is well recognised in ITU and demonstrated to be an appropriate means to promote the European positions versus other parts of the world. EU should further carry on its collaboration with CEPT in order to lead to global European positions in line with EU expectations and interests.

The current process based on RSPG opinions has proved to be efficient and might be enhanced by European Parliament and Council support.

As a complement, early European Union initiatives to express support on relevant issues to external parties might be valuable.