

## ETNO Reflection Document commenting on the RSPG opinion on the Radio Spectrum Policy Programme



April 2010

### Executive Summary

ETNO welcomes the establishment of multi-annual radio spectrum policy programmes whereby a long term vision that extends to at least 2020 is necessary. The Association agrees with the general directions defined in the RSPG opinion on the radio spectrum policy programme.

ETNO supports the harmonisation of spectrum usage and appreciates flexibility of usage by moving towards technology neutrality which however requires a very careful approach on a band by band basis.

ETNO supports the harmonisation of usage and regulation of the 790-862 MHz band all over Europe for medium and low power bidirectional communications networks and a clear deadline should be set. Furthermore, medium and long term availability of additional spectrum for electronic communications will be essential for new communication services development and should be made timely and sufficiently available as e.g. in the US.

### Introduction

ETNO welcomes the procedure defined by the new electronic communications regulatory framework concerning strategic planning and coordination of radio spectrum policies in the EU. The establishment of multi-annual radio spectrum policy programmes should help Member States to reach common views on policy priorities and provide better regulatory certainty to stakeholders. A long term vision that extends to at least 2020 is necessary to develop an appropriate spectrum strategy in the EU. ETNO appreciates the role of the European Commission and RSPG for that purpose.

ETNO agrees with the general directions defined in the RSPG opinion on the radio spectrum policy programme.

The importance of wireless communications for the European economy and citizen's quality of life requires an excellent harmonisation of spectrum usage and the coordination of Member States policies. The use of the digital dividend is one of the areas where coordinated progress achieved in the short term would lead to significant benefits for the whole community.

## **ETNO view**

### **Better spectrum efficiency**

The progress of mobile services is partly based on the continuous improvement of spectral efficiency through the deployment of new technologies. Incentives should be developed in order for the public and government sectors to adopt a similar, dynamic approach towards a better use of radio spectrum resource. New sharing scenarios should be considered, taking benefits of the development of innovative technologies.

ETNO supports the harmonisation of spectrum usage and appreciates the efforts made to improve the flexibility of usage by moving towards technology neutrality which however requires a very careful approach on a band by band basis. The opening of the 900 MHz band to new technologies and further work concerning the 1800 MHz band are very satisfactory in this respect.

New methods and conditions included in the licences to provide interference immunity might be checked and ascertained before extending their use. In particular, it appears that the regulation of the usage of the 800 MHz band by ECN through a "block edge mask" approach is addressing only part of the problem, which solution appears to be costly and time consuming.

### **Digital dividend**

ETNO supports the harmonisation of usage and regulation of the 790-862 MHz band all over Europe for medium and low power bidirectional communications networks and therefore welcomes the initiatives taken by the European Commission to foster such harmonisation process.

ETNO believes that further actions should be developed in order to accelerate the 800 MHz spectrum availability all over Europe. In order to achieve this goal, it would be useful to set a deadline for EU Member States for the designation or making available the 800 MHz band for networks other than high-power broadcasting. Further improvements of the regulatory scenario should be envisaged.

## **Need for additional spectrum for electronic communications**

Furthermore, as consumer demand for bandwidth is growing rapidly, medium and long term availability of additional spectrum for electronic communications will be essential for new communication services development. 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. Appropriate actions should be taken for a consideration of new harmonised mobile spectrum allocation by WRC-16.

ETNO believes that consideration of new bands and refarming processes should be based on a detailed and sound technical, regulatory and economic analysis.

Considering video content delivery evolutions, allocation of additional spectrum for ECN below 790 MHz, further addressing geographical coverage and offering good propagation penetration should be considered in order to take into account diverse national situations and allow the use of 20 MHz carriers in this band. A coordinated approach would be the best one, as already proven in the 900 MHz band where the 'GSM Directive' has allowed the deployment of seamless services all over Europe. The recent revision of that Directive is the perfect follow up of such kind of approach.

## **Member States cooperation and policy coordination**

ETNO agrees that these objectives would better be reached through an enhanced cooperation of competent national authorities. The creation of BEREC would help for that purpose.

Spectrum harmonisation measures including the implementation of appropriate flexibility should benefit from the work of CEPT and ETSI. ETNO believes that the current organisation of the European preparation of WRCs under the lead of CEPT developing European Common Proposals and coordinating the country members during the conference is satisfactory. An enhanced cooperation of these actors with the EC based on a clear identification of European spectrum interests and priorities would provide the conditions for achieving the EU's objectives.

The EU position should be fostered through bilateral preparatory meetings with neighbouring non-EU countries and other regional organisations. EU and CEPT should also give more emphasis to WRC decisions, which facilitate coordination at EU borders.