

**Public consultation on the RSPG Opinion in preparation for the
Radio Spectrum Policy Programme (RSPP)
Qualcomm Response**

April, 2010

Qualcomm welcomes the opportunity offered by the RSPG to share its views on the priorities of the future EU Radio Spectrum Policy Programme (RSPP). Qualcomm is, in particular, highly appreciative of the visionary and strategic Opinion drafted by the RSPG in preparation for the RSPP.

Internet is going mobile in Europe and globally with considerably higher data rates and increased diversity of connected devices (phones, laptops, e-readers, cameras, etc.). Mobile data traffic has already surpassed voice traffic on 3G networks and will continue to grow rapidly. By the end of 2011, mobile broadband subscribers are forecasted, globally, to surpass fixed broadband subscribers and will constitute, by the end of 2012, more than 70% of all broadband subscribers. By 2014, mobile data traffic is projected to grow by 4500% and to generate nearly 100 Billion Euros in operators' revenues. The provision of e-services (*Road Safety, Telematics and Value Added Location Based Services, e-Education, e-Learning, e-Health, e-Inclusion and e-Government*) over ubiquitous mobile broadband networks across the EU, will further bring considerable benefits to European businesses and consumers.

The long term success of mobile broadband services in Europe will be predicated on the timely access to new radio spectrum and on the continuous investments to enhance devices and networks capabilities to support the exponential mobile traffic growth. Mobile Broadband networks will evolve towards higher spectrum efficiency, data rates and capacity with the deployment of HSPA+, LTE and LTE-Advanced and the implementation of advanced network topologies (macrocells, microcells, picocells and femtocells) and interference management techniques.

Europe has been at the forefront of mobile spectrum allocation and harmonisation¹, ensuring, over the years, a sustainable and successful growth of mobile broadband services.

Qualcomm believes that it is urgent for Europe to start the implementation of a roadmap ensuring the EU wide completion of analogue TV switch-off by 2012 and the allocation of the 800 MHz band to mobile as early as possible. Qualcomm therefore welcomes the objective set by the RSPG in its Opinion to “achieve coordinated availability of the 800 MHz band for ECS other than broadcasting in all the EU Member States by 2015.”

The allocation of additional spectrum, in the future, in particular below 3 GHz, to accompany the long term evolution of mobile broadband will be crucial; the harmonization of this spectrum will be a key and essential component to enable economies of scale, affordability and competition of global standards. We therefore highly appreciate the call by the RSPG to “ensure that sufficient spectrum for coverage and capacity purposes is allocated within the EU so that all citizens could have access to ubiquitous high-speed broadband.”

In order to achieve this objective, Qualcomm believes that a priority area of the Radio Spectrum Policy Programme would be to initiate a strategic reflection on new approaches to release and license spectrum for mobile use in Europe, through intelligent sharing mechanisms and associated regulatory regimes, in line with the policy goal put forward by the RSPG in its Opinion, namely to “create appropriate regulatory mechanisms to foster more efficient use of spectrum, both for the commercial and public sector and to develop a spectrum policy approach for intelligent spectrum sharing which should, inter alia, promote the use of cognitive technologies, and enable the use of spectrum that is currently unused”.

¹ Mobile Broadband harmonised spectrum in Europe includes the 900 MHz, 1800 MHz, 1.9/2.1 GHz, 2.6 GHz, 3.4-3.8 GHz bands and most recently the 800 MHz Digital Dividend