



HELLENIC REPUBLIC
Ministry of Infrastructures,
Transport and Networks
General Secretariat of Communication

Dear Sirs,

In an effort to contribute to the formation of an RSPG Opinion on the RSPP consultation document, our Administration presents some input to specific points of the Draft Opinion RSPG document. In general we agree on the RSPG Opinion as expressed in this document. Our specific comments to the general proposals are the following:

○ **Contribution to the EU2020 vision**

- Point 9: Conditions under which innovation is supported should be technology neutrality, environmental care, co-existence of technologies and services, ease of use, minimization of digital divide etc.
- Point 10: This is a goal to be assigned to different NRAs by imposing specific requirements to spectrum rights assignment.
- Point 12: However, the rules and the conditions under which a part of UHF band may be available, as digital dividend, should be clearly predefined. Special care should be taken in order to protect both broadcasting and communication services (operating in the digital dividend spectrum) from mutual interference, in case that neighbour (non-EU) countries do not have the same policy for digital dividend, i.e. when the 800MHz band is released for communication services in one country whereas a neighbor country still use this band for broadcasting services.
- Point 13: We raise some concerns as for the issue of releasing more 'new' spectrum. There is sufficient amount of spectrum allocated for broadband services when considering today needs for coverage and speed. However, when looking for future needs and requirements there should be a more extensive discussion throughout Europe for the utilization of Digital Dividend in order to benefit from its special characteristics. That would require an EU unified approach to permit fast deployment. The EU should specify how feasible it is to release more 'new' spectrum in each Member State, taking into consideration the special spectrum allocation situation of each country, the effort and the mechanisms we are undertaking in order to release the Digital Dividend spectrum.
- Point 14: Efficient spectrum use should not be restrained by EU-wide regulatory framework. Specific regulatory tools may be used in a "market-adaptive" way.
- Point 15: It is suggested to specify measurement criteria in each MS. There should be a mechanism to oblige each country to collect and report on Spectrum Usage, per service, and further on to provide the results of spectrum usage in terms of development, of competition and similar factors of efficient allocation and usage (e.g. Annually Reports and Studies on Usage and its effect to other sectors of economy, society, growth and development), in conformance with the concepts of EC implementation report. Moreover, secondary trading should be under control, and specific mechanisms should be established in order to protect competition and equitable access.

- **Spectrum Governance in the EU**

- Point 16: Prior to the review, there should be certain studies and feasibility analyses with a focus to military usage.
- Point 17: Under the Digital Agenda item for Single Digital Market, this issue is of major importance.
- Point 18: The spectrum shall be managed in a way to also reflect user, technological and scientific trends. Moreover, in order to achieve economies of scale and to maximize impact to citizens and businesses, segmentation of spectrum by member states to services and options of not viable and efficient nature, will increase user's confusion minimizing the overall input. Finally, refarming and its rules should be treated in a national manner and is served properly already with the current legislation and regulatory framework.
- Point 23: Deployment of European spectrum monitoring networks should be encouraged, aiming to facilitate the efficient interference control.
- Point 24: As for the 'collective support mechanism', further support should be given to those countries with non EU neighbors.

- **External Relations**

- Point 26: The ECPs should be pre-defined and agreed upon, and also should reflect the internal situation of each Member State. They should also satisfy continuity and coherence in national legislation. Cross-borders coordination with non-EU countries could impose serious burdens to this goal. A centralized approach with a special coordination advisory body to take this action for all EU could be of benefit.
- Point 28: Strong relations and cooperation among the CEPT bodies and RSPG is vital. It is proposed that EU allocates this task to an existing or newly formed advisory team in order to preserve its interests when new services are about to rollout in a global EU manner. Negotiations should take into consideration Member States' interests and somehow centrally these should be communicated and coordinated with other non-EU countries.
- Point 30: This point does not clearly reflect the issue, it is proposed to be rephrased. It is suggested to specify who will provide such assistance during negotiations. EP and the Council should perhaps form an advisory team in order to act as a facilitator during such negotiations.

- **Spectrum Policy Objectives**

We agree with the hereby presented high-priority spectrum policy objectives provided by the RSPG, and we would only like to add the following issue:

- We should have a relaxation of terms for secondary trading in specific spectrum bands with extra care on preventing extensive partitioning of spectrum that could lead to unusable or non-efficient spectrum utilization. NRAs should have all necessary tools to monitor market and act both proactively and reactively when such intervention is considered necessary.