

Radio Spectrum Policy Group – Secretariat
DG CNECT B4: Spectrum – Office: BU33 7/065
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Cellnex comments on the (Draft) RSPG Opinion on 5G implementation challenges (RSPG 3rd opinion on 5G).

Dear Sirs,

Please find enclosed the comments on the ***(Draft) RSPG Opinion on 5G implementation challenges (RSPG 3rd opinion on 5G)*** from Cellnex Telecom.

Yours sincerely



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[Cellnex Telecom](#) (**Cellnex**) welcomes the opportunity to provide comments on the (Draft) RSPG Opinion on 5G implementation challenges (RSPG 3rd opinion on 5G). We always, **Cellnex** is available to collaborate with RSPG on these and all issues that might be of interest.

Cellnex is Europe's leading operator of wireless telecommunications and broadcasting infrastructures with a total portfolio of 28,000 sites including forecast roll-outs up to 2022. **Cellnex operates in Spain, Italy, Netherlands, France, Switzerland and the United Kingdom.** Our business is structured in four major areas: telecommunications infrastructure services; audiovisual broadcasting networks, security and emergency service networks and smart and IoT services. The company is listed on the continuous market of the Spanish stock exchange and is part of the selective IBEX 35 and EuroStoxx 600 indices. It is also part of the FTSE4GOOD and CDP (Carbon Disclosure Project) sustainability indexes and the Standard Ethics index.

In our double role of infrastructure and service provider, **Cellnex** feels that it is particularly important to have a clear picture on the allocated spectrum for all the different services; IMT, broadcast, ITS, PPDR, etc. This certainty fosters the innovation and investment which impacts on many economic and productive sectors in Europe, increasing GDP and creating jobs. At this regard, we welcome the RSPG work on creating policy levers to provide needed investment certainty for the European digital ecosystem for all different services that need different spectrum allocations.

Cellnex broadly supports the draft RSPG Opinion. However, provides below comments on certain points.

- **Section I: Concerning the Defragmentation of the 3.4-3.8 GHz frequency band.**

Cellnex is fully committed with the success of 5G in Europe. At this regard, we do totally agree with RSPG view on making available the 3.4 – 3.8 GHz band for mobile services in the best technically way and as soon as possible.

- **Section II: In order to ensure connectivity for vertical industries.**

No one size fits all; there are specific services with specific needs which need specific network and specific spectrum. At this regard, as RSPG recognises, *“there may be need for technology neutral dedicated EU harmonised spectrum”*. This proposal would be a way forward when implementing digital innovative solutions in specific vertical industries as it would provide legal certainty for investments and for the deployment of the technical ecosystem.

As an example, there is the envisaged German allocation of 100MHz of spectrum in its forthcoming auction to large industries which would enable the industry to build dedicated networks over dedicated frequencies, optimising the investments and improving its competitiveness.

Therefore, **Cellnex** supports the RSPG recommendations on *“consider other spectrum solutions including dedicated or shared spectrum for the business/sectoral needs (“verticals needs”) that may not be met by mobile operators”*. We do really believe that dedicated resources (spectrum and networks) are key to provide a vast range of services which would require high level of service (including reliability) while optimising safety, efficiency, deployment and investment.

In addition, as a company present in 6 countries in Europe, we also agree on the need for technology neutral dedicated EU harmonised spectrum “in order to respond to some targeted EU public policy objectives requiring, for example pan European services for specific verticals”.

As a final remark, Cellnex recognises the value of the work done by RSPG, including its stakeholders workshops where all the interested parts are invited to express their views. After having read the RSPG proposals, we are fully committed and we do really believe that these meetings are useful and RSPG takes the views of the participants into consideration.

About Cellnex Telecom

