

To: **Radio Spectrum Policy Group**

Spectrum – Unit B4

Electronic Communications Networks and Services Directorate

Directorate-General for Communication Networks, Content and Technology (CNECT)

European Commission

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Rome 26th November 2018

Subject: **Fastweb's contribution to the Draft RSPG Third Opinion on 5G Networks**

Introduction and background

Fastweb is the leading alternative network infrastructure operator in Italy, full MVNO and cloud service provider. Having deployed and owning more than 45.000 km of fibre links, combined with a network of more than 20.000 street cabinets particularly in densely populated areas, Fastweb has earned a competitive advantage at infrastructure level for the emerging requirements of 5G communications. Fastweb has the ambition of becoming a key player in the deployment of 5G networks.

With this view, Fastweb acquired the use of 40Mhz in the 3.4 to 3.6 GHz 5G band and 200Mhz in the 26GHz spectrum band and it is currently engaged in 5G trials in Rome, Genova, Bari and Matera. Fastweb has also built and it is expanding the largest and most powerful WiFi network in Italy allowing downlink speeds of up to 1Gbps in densely populated areas that supports the mix of technologies underpinning 5G services.

Fastweb strongly believes in the need to accelerate in Italy and in Europe the transition to fully convergent connectivity services and it is committed to rollout investing more than 30% of its revenues in network infrastructure to possibly become the first fully convergent operator in Italy.

Observations

Fastweb generally welcomes the third RSPG Opinion on 5G. However, we would like to stress a few crucial arguments concerning mainly points 6 and 7 of the draft Opinion and particularly the *Spectrum solutions for specific vertical needs*:

- Fastweb is concerned that Member States might be encouraged to decide indifferently between dedicated spectrum and shared spectrum for specific vertical needs. We strongly believe that for



such need **only shared solutions should be considered**, because an obligation to dedicate spectrum would not respond to the need for an efficient use of such a scarce resource and would undermine the much-needed flexibility in the management of spectrum band.

- Secondly, Fastweb is concerned that the Opinion does not recognise the need for licensed operators to count on a fair return of investments. In particular, given the high value of 5G Spectrum it is essential **that any sharing obligation imposed after the assignment of the spectrum band, is balanced by a fair corresponding financial compensation**. We suggest that the RSPG opinion expressly recognises this point.

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