

## **Deutsche Telekom Comments on the Draft RSPG Opinion on 5G implementation challenges**

Deutsche Telekom AG (DT) highly appreciates the opportunity to comment on the draft “RSPG Opinion on 5G implementation challenges RSPG 3<sup>rd</sup> opinion on 5G). Document (RSPG18-036 FINAL).

DT supports the view of RSPG that the current fragmentation of the 3.4-3.8 GHz band is one of the major challenges for a successful and effective implementation of 5G in Europe. A second very important issue also covered by the RSPG opinion is the question how future communication requirements from verticals can be satisfied with the available resources.

In general DT supports the comments from GSMA but would like to provide some additional comments:

### **1. Defragmentation of the 3.4-3.8 GHz frequency band**

DT agrees that the 3.4-3.8 GHz band is suitable for initial and long term 5G-service deployments. To exploit the 5G opportunities for data throughput, capacity and latency large channel bandwidth per operator is the precondition. DT supports the recommendation of RSPG that legacy ECS being not compatible with the harmonized technical conditions should not hinder large contiguous blocks needed for 5G services.

RSPG notes the different national legacy situations in the band and thus recognizes the need for different national approaches. In general DT supports this assessment but would like to ask RSPG to coordinate or at least monitor the progress of defragmentation to facilitate a timely implementation of 5G all over Europe.

### **2. Ensure connectivity for vertical industries**

DT agrees to the view of RSPG that 5G will play a significant role to satisfy future communication requirements for verticals. DT also supports the RSPG idea that these services will be provided by different parties including public mobile operators. It is also recognized that sufficient spectrum resources need to be available for the deployment of local private industrial networks. DT is of the view that this can be implemented either by dedicated assignments on a local basis including to nationwide mobile operators or subleasing from them. In addition, 5G provides the opportunity to satisfy the requirements of the verticals by using dedicated technologies such as network slicing provided by a public mobile operator based on its licensed spectrum. Some of the requirements from verticals can still be fulfilled by solutions based on unlicensed spectrum (e.g. 5 GHz or 57-66 GHz).



**LIFE IS FOR SHARING.**

Therefore, DT supports the view of RSPG to also apply for industrial use cases to the principle of technology neutral spectrum usage rights. This allows the implementation of dedicated communication solutions for verticals independently on technology but also independently from the used spectrum. A reservation of spectrum in the ECS bands exclusively for industrial usage is not required and has a lot of disadvantages for the 5G deployments. Such a reservation would lead to an induced scarcity of 5G resources (in Germany 25% of the overall resources has been made unavailable for national 5G services and, due to the rather local industrial usage, to an inefficient spectrum usage.

DT appreciates the view of RSPG for a case-by-case assessment when considering intended pan-European services. Such use cases need a different treatment and should be carefully discussed by considering the needs of all involved stakeholders.