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Via Online Submission to CNECT-RSPG@ec.europa.eu.

Telecommunications Industry Association

Comments to the Radio Spectrum Policy Group of the European Commission

“Strategic Challenges facing Europe in addressing the Growing Spectrum Demand for Wireless Broadband”

On behalf of the Telecommunications Industry Association (TIA), we welcome the opportunity to submit comments to the Radio Spectrum Policy Group (RPSG) with respect to its request for opinions to address the growing spectrum demand for wireless broadband in Europe.

TIA represents the global information and communications technology (ICT) manufacturer, supplier, and vendor industry through standards development, policy initiatives, business opportunities, market intelligence, and networking events. With support from approximately 500 participating companies, TIA enhances the business environment for companies involved in telecommunications, broadband, mobile wireless, information technology, networks, cable, satellite, unified communications, emergency communications, and the greening of technology. TIA is accredited by the American National Standards Institute (ANSI) as an international standards development organization.¹

Increasingly, European consumers are utilizing mobile devices such as smartphones and tablets to access the internet. The growing use of these devices is creating greater levels of demand for wireless broadband throughout the region. TIA estimates the wireless subscriber base in Europe to be 1.09 billion by 2016.² There is also a global trend of mobile subscribers moving from “feature phones” that are typically used for voice communication and have limited need for wireless broadband to smartphones that require higher levels of wireless broadband to access the internet, use apps, and view videos. In the case of Europe, greater demand for wireless broadband access has resulted in a 33 percent compounded annual growth rate for mobile

¹ TIA publishes an annual report that includes the latest actions taken by each respective TIA engineering committee toward the development of standards for the advancement of global communications. See [TIA, Standards & Technology Annual Report](#) (2012).

² This data, as well as all other projections and statistics provided in this document which are not cited to otherwise, are derived from the [TIA 2013-2016 ICT Market Review & Forecast](#), a proprietary annual publication from the Telecommunications Industry Association (TIA) containing distilled data and analysis on information and communications technology industry trends and market forecasts through the end of 2016.

broadband subscribers between 2010 and 2013.³ In addition, TIA data shows that in 2011 the European smartphone market generated a 33.9 percent increase in total wireless handset spending, and in 2012, the introduction of LTE phones further propelled the wireless market in Europe and led to an additional 9.7 percent increase in spending, helping to generate \$71.8 billion (€54.96 billion⁴) in spending in 2012. These trends are likely to continue for the foreseeable future – increasing demand in the European market for wireless broadband.

TIA applauds the important objectives contained within the Digital Agenda for Europe (DAE) and notes the critical role that wireless broadband will play in meeting many of the goals related to broadband coverage and internet usage in the DAE⁵. As noted in the Draft RSPG Opinion⁶, mobile broadband services are an important part of the overall provision of broadband access “because its cost effectiveness may exceed that of wired broadband, especially in areas with a low population density, and second, because of the distinct value offered by mobility and wireless connectivity in general”. In addition, the Draft RSPG Opinion notes the Draft ECC Report 188, that “WiFi networks play an important role in delivering broadband services as an extension to wired broadband in geographical areas which can be limited in size and where no wide area mobility is required, e.g. in home and office environments, hotspots in cities”.

These two points contained in the Draft RSPG Opinion underscore the need for a dual-approach that will result in the maximum availability of wireless broadband spectrum for consumers in the European market. TIA notes that in general, exclusive licensed spectrum models offer a superior user experience based on predictable service quality. Cleared, exclusively licensed spectrum bands generally allows for the efficient and dependable use of spectrum suitable for mobile broadband deployment, and maximizes network investment, marketability, availability, and consumer use. TIA further supports protection from harmful interference for licensed uses, adjacency to like services and allocations of wide, contiguous blocks of spectrum. TIA however also supports spectrum management policies that facilitate global harmonization and coordination of spectrum allocations. This includes the development of unlicensed spectrum in internationally harmonization bands, for example, the 2.4 GHz and 5 GHz bands.

With respect to unlicensed spectrum, TIA supports the tentative findings in the Draft RSPG Opinion to further study the potential allocation of additional spectrum in the 5GHz band for shared unlicensed use. TIA strongly supports expansion of unlicensed access to the 5 GHz band on a technology-neutral basis and access to the band should not be limited by technology. Instead technologies that meet the rules for the band should be permitted. With the goal of providing

³ International Telecommunications Union, [The World in 2013 ICT Facts and Figures](#), February 2013

⁴ Currency conversation \$1.00 = €0.7655

⁵ See Digital Agenda for Europe website, [About our goals](#), accessed on 22 April 2013

⁶ Radio Spectrum Policy Group, [Draft RSPG Opinion on Strategic Challenges facing Europe in addressing the Growing Spectrum Demand for Wireless Broadband](#), RSPG13-511 Rev 1, 20 February 2013,



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improved wireless broadband access, new radio local area network (RLAN) technologies with unprecedented throughput speeds are now being introduced to the market that utilize the 5GHz band. Of particular note is the next generation Wi-Fi IEEE 802.11ac; this standard is poised to receive final ratification later this year.⁷ Products including this standard are already available on the market and with final approval of the standard, volume shipments are anticipated.

TIA would again like to thank the RSPG for the opportunity to provide comments as it forms its opinion on how to maximize the available wireless broadband spectrum in the region. We look forward to further engaging the RSPG as it proceeds with finalizing its opinion to the European Commission. If you have any questions, please contact Eric Holloway, Director for International and Government Affairs at TIA. He can be reached at eholloway@tiaonline.org.

⁷ See [Official IEEE 802.11 Working Group Project Timelines – 2013-03-22](#), accessed on 23 April 2013