

The RSPG recommends that:

1. On the basis of the analysis in Annex 1 and the roadmap for future broadband spectrum in Annex 2 of this Opinion a strategic plan should be developed by the Commission to make the necessary spectrum available to meet the future demand for wireless (terrestrial & satellite) broadband services in the time frame 2013-2020, including the intermediate target in the RSPG of at least 1200 MHz of spectrum by 2015.

Response: FIN supports the development of a strategic plan to meet the future demand for wireless broadband services in the time frame 2013 - 2020. The priority should be given to terrestrial mobile broadband services and the demand for additional spectrum should be well justified. Annexes 1 and 2 represent a good analysis of the bands available. However, we believe that some additional frequency bands should also be considered, eg 1492 -1518 MHz and 2700 - 2900 MHz.

2. The strategic plan should include: -
 - i) a detailed analysis of the usage of all bands identified in Annex 2, including the 700 MHz, 1.5 GHz, 2.3 GHz and 3.8-4.2 GHz bands, in Member States and their potential for wireless broadband services on a harmonised basis, prioritising the bands in accordance with their potential and timeframe in which they are likely to be available;
 - ii) further exploration of the economic and social implications of the various options at macro level;
 - iii) the spectrum needs for SAB/SAP (both audio and video applications);
 - iv) an analysis of the need for licence exempt spectrum for WBB.

Response: FIN supports the details presented above. We do not see any justification for additional licence exempt spectrum for WBB (5 GHz RLAN).

3. In addition to the above, the RSPG recommends the development by the Commission, in cooperation with the Member States, of a long-term strategic policy on the future use of the UHF band (470-790 MHz), taking account of, in particular, the spectrum needs of the DTT platforms in the EU, the spectrum needs of PMSE, and the possible benefits arising from future convergent broadcasting-mobile platforms to deliver linear media/audiovisual services and high-audience video and data to mobile devices (smartphones, tablets, etc.).

Response: As a priority a view and strategy on the future use of the 700 MHz spectrum should be developed. This can emerge with the development of a long-term strategy policy of the entire UHF band (470 - 790 MHz). In Finland the decision has already been made to have the 700 MHz band available for WBB after 2016 and the band 470 - 698 MHz to be available for TV broadcasting at least until 2036. In sparsely populated areas, like most areas in Finland, the spectrum below 1 GHz is most valuable to WBB operators, since it offers an economical way to establish a good coverage for the networks.

4. In developing this strategic policy for the future use of the UHF Band the Commission should in the short-term, develop:
 - a) a common European policy objective in time for WRC-15 on the refinement of the lower band edge and on possible channelling arrangements for mobile services in the 700 MHz band; and

- b) an EU-wide strategy to be discussed at political level on the future use of the 700 MHz band. This strategy should consider elements such as duration of broadcasting licenses, the necessity to transition to new technologies, the variety of digital terrestrial platforms in Member States and cross-border frequency coordination issues; and
- c) a clear policy to facilitate any migration which may ease making available the 700 MHz band to wireless broadband while allowing Member States to take measures relating to TV receivers in order to mandate more efficient technologies (e.g., DVB-T2, HEVC); and
- d) a review of ETSI and CENELEC standards applicable to DVB-C and DVB-T reception. This includes a need for a clear EU policy on improving spectrum efficiency, where it would be an essential requirement to construct TV receivers so as to avoid harmful interference;

Response: FIN supports all these sub-items to be studied and discussed before any decision is made on the long term strategy.

- 5. For the band 1452-1492 MHz, noting that CEPT has established a project to develop harmonised implementation measures for SDL applications, the Commission should consider adopting complementary measures to further promote the use of this band for SDL, while preserving the possibility for Member States to use part of this band for other uses such as broadcasting.

Response: FIN supports promotion of this band for SDL, noting the potential problems at the external EU borders, due to other usage in neighbouring countries. This band is considered in the WRC-15 preparations and there are also proposals to include adjacent bands and consider the core 1.5 GHz band as a globally harmonized FDD band.

- 6. In the case of the 2GHz bands identified for use by Mobile Satellite Services with Complementary Ground Component (1980-2010 MHz/2170-2200 MHz), if future actions taken by Member States in relation to Decision 2011/667/EU result in the withdrawal of licences, the Commission should consider re-allocation of the bands to terrestrial mobile services.

Response: FIN supports early actions to review the fulfilment of conditions in the two MSS licences. In case of the conditions are not fulfilled the spectrum should be reallocated on EU-wide basis to terrestrial WBB systems.

- 7. For the band 2300-2400 MHz, noting that CEPT has established a project to develop harmonised implementation measures for MFCN in the band, the Commission should consider adopting complementary measures to further promote shared and flexible use of the band between wireless broadband applications and other services, based on LSA regulatory provisions, facilitating the long-term incumbent use of the band in the territory of those Member States that wish to maintain such use.

Response: FIN supports LSA regulatory provisions for this band.

8. The frequency range 3800-4200 MHz may play a role in the provision of ECS to enhance future capacity requirements especially in urban areas. The Commission should study the possibility of sharing in Europe between the FSS and terrestrial wireless broadband services in this frequency range, while recognizing that the situation within and outside Europe may differ, thus not enabling worldwide harmonisation for shared use of the band by wireless broadband services.

Response: FIN supports all investigations with a target for a wide introduction of ECS in this frequency range.

9. In considering the harmonisation of frequency bands for wireless broadband the Commission should take into account the fact that the actual use of bands for wireless broadband in Member States will vary, depending on the national requirements for broadband access and for other services.

Response: FIN supports the development of a strategic plan to identify a minimum amount of harmonised spectrum for WBB within a time frame 2013 - 2020 and an indication of possible additional spectrum needed for the highest user densities within EU. Sufficient transition time is required with several proposals for additional frequency bands for WBB.