

RSPG public consultation on the Work Programme for 2022 and beyond

Qualcomm Response

Qualcomm welcomes the opportunity to comment on the proposed Radio Spectrum Policy Group (RSPG) final draft Work Programme for 2022 and beyond and applauds RSPG for the continuous excellence and relevance of its actions based on the twin transition with the European Green Deal and the European Digital Decade. The Opinions of the RSPG have set, thanks to their strategic long-term vision, the basis of spectrum usage harmonization in Europe. Qualcomm looks forward to RSPG future work in shaping the European Union spectrum policy, in its enhanced role under the new regulatory framework. Furthermore, Qualcomm thanks RSPG for the fruitful cooperation between the industry and regulators allowing a better understanding of the challenges and constraints facing the sector. Qualcomm therefore suggests continuing this collaboration for 2022 and beyond.

Peer review and Member States cooperation on authorisations and awards

Qualcomm supports the implementation of this peer review approach ("Peer review") under the "European Code" adopted in late 2018. In the perspective of efficient frequency band allocations, the peer review is essential to identify the lessons to be drawn from the attributions carried out and to compare the mechanisms. Pursuing this collaborative dynamic, and upstream of frequency allocation, the peer review allows particularly fruitful cooperation at a key moment in the process. Qualcomm's understanding is that the process will be entirely closed to the industry and thus it would like to emphasize the importance of transparency and encourages the RSPG to continue organizing stakeholder workshops on awards as well future publishing of annual reports on awards experiences and best practices.

WRC-23

Qualcomm agrees that RSPG should finalize the recommendations for European Union position(s) on items which are of importance for EU policies in the view of the next WRC-23.

“Good offices” to assist in bilateral negotiations between Member States

Cross border coordination influences the release of spectrum in some areas for new services and therefore the roll out of mobile broadband for all European consumers. We acknowledge the role RSPG plays in this field, as well as in the monitoring of coordination of harmonized spectrum bands, both within the EU and with non-EU countries. Qualcomm supports this initiative which will remain crucial as 5G frequency bands are opened across Europe.

Mobile technology evolution – experiences and strategies

In a context of technological neutrality and efficient use of spectrum made possible by the latest and most efficient technologies where possible, Qualcomm supports the RSPG initiative to consider the migration of existing services and the potential implications, as well. that ensuring that new EU-wide applications will be technology neutral. Qualcomm welcomes the RSPG initiative to organize and schedule a stakeholder workshop on this topic.

Digital decade 2030

5G deployment is essential to helping Europe to achieve its Digital Decade vision as well helping enable sustainable development goals to be realized. In addition, Qualcomm considers that it is important from a competitiveness perspective that Europe takes a global leadership role in 6G research, standardisation and development targeting around the year 2030 for commercial deployments and the RSPG actions in relation to 6G are supported.

The development of 6G and possible implications for spectrum needs and guidance on the rollout of future wireless broadband networks

5G licensing and deployments are well underway in low, mid and high bands. Qualcomm encourages RSPG in conducting an evaluation of 5G in Europe in order to identify aspects that could be better addressed in the 6G era, including in the wireless spectrum domain and the role of spectrum in the different ranges (from the low bands to the sub-THz range) in achieving the desired outcomes.

Qualcomm encourages RSPG to engage in high-level workshops with the entire industry – network operators, verticals, manufacturers –, to provide opportunities for open discussions and better cooperation in view of launching the 6G successfully for both consumers and business.

Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU

Qualcomm supports RSPG initiative to anticipate the reflections on the future of the UHF band, in particular on the major elements of a strategic policy for the UHF band in the EU with the objective of ensuring a sustainable “win-win” situation for the sectors concerned such as well as benefits for consumers while promoting the single market and strengthening the role of the EU in global developments.

Role of Radio Spectrum Policy to help combat Climate Change

Qualcomm agrees with the importance of the radio spectrum for the development of the electronic communications and broadband as basis of the digitization of the society and industries, in line with the EU priorities and policies. We equally acknowledge the importance of the climate change topic at European level and the climate-neutral target for Europe is 2050. Qualcomm supports RSPG’s focus on sustainability and climate change as a key important horizontal principle and high-level priority and is of view that efficient spectrum policy and management also supports climate goals.