



BTG Response to the RSPG Public Consultation on the Draft RSPG Work Programme for 2022 and beyond. Issued 24 November 2021.

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Introduction

BTG is an interest user group in the area of ICT and Telecommunications in the Netherlands. BTG represents since 1986 the interests of Dutch enterprises and organizations using communications services. BTG organizes network meetings for sharing knowledge and experiences. BTG counts 180 members from business and governmental organizations and represents these organizations nationally and internationally. BTG is member of the INTUG.

BTG interconnects organizations and performs active lobbying between government, suppliers and members in the area of ICT and Telecommunications. BTG recognized already many years ago the strategic value of radio spectrum in the development of the digital society. For frequency spectrum matters BTG is lobbying the Ministry of Economic and Climate affairs in the Netherlands.

BTG has established 5 years ago an expert group within their members, called KMBG: Critical Mobile Broadband Users. This expert group represents BTG members with business and mission critical mobile communications need. The expert group articulates the need for critical communications and bundles the interest of the users. The group shares knowledge of communications technology and contributes to policies for the government and mobile network operators. In the past years BTG in close cooperation with the Dutch MNOs have agreed on a specification for passive installations to provide mobile indoor coverage.

BTG recognizes a continuing mismatch between the mobile mass market services and critical communications needs. Mass market services are inherently best effort services. Best effort services are not good enough for business or mission critical needs. Critical needs communication can be provided by either private networks or by public mobile networks or both. It is however not known whether or not mobile operators can and will develop solutions that sufficiently cater for the various critical communication needs of enterprises and other organizations.

The BTG response

The RSPG (Radio Spectrum Policy Group) has launched a public consultation on November 24. 2021 on the document **RSPG21-044 Work Programme for 2022 and beyond.**

RSPG has identified the following work items to be developed during the next years:

- Peer review and Member States cooperation on authorisations and awards
- WRC-23
- “Good offices” to assist in bilateral negotiations between Member States
- Mobile technology evolution – experiences and strategies
- Digital decade 2030
- The development of 6G and possible implications for spectrum needs and guidance on the rollout of future wireless broadband networks
- Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU



- Role of Radio Spectrum Policy to help combat Climate Change

BTG's general observation

After reviewing the Draft RSPG Work Programme 2022 and beyond we see many important subjects that the RSPG has addressed in their plans. We are convinced that the RSPG has an important role in the harmonization of spectrum within the EU and especially on spectrum for verticals using private mobile broadband networks.

Additional observations

BTG misses the following subjects and activities in the work programme 2022 and beyond:

- Mobile connectivity for enterprises in the EU. Mobile connectivity in the enterprise market is a main driver for digitization. The enterprise market and its verticals have specific requirements on mobile connectivity services compared to the consumer mass market. In a healthy market freedom of choice is a prerequisite. In EU countries that have issued spectrum to verticals for private networks it has been demonstrated that the digitization process is accelerating substantially. We see that also in these front runner countries mobile network operators are accelerating with developing specific services for this market segment, due to the competition pressure of private networks. BTG sees an important role for the RSPG to improve verticals in achieving their digitization goals to make use of private networks or an appropriate set of services provided by mobile network operators. To enable private network solutions the RSPG should support the allocation of relevant additional frequency bands.
- Outside the EU there is competition in the digitization process. In the US and Far-East developments are speeding up. Europe thinks that it is a front runner in the digitization process on world level. However, in regions outside Europe we see much more harmonization of spectrum available for private networks, and due to that acceleration in digitization, compared to the scattered situation in Europe.

Our suggestions for the 2022 RSPG work programme are as follows:

- Identify for EU harmonisation a number of frequency bands that should be allocated for private usage within the EU. Ideally such frequency bands should also be available on a global scale to support multi-national enterprises with global activities and to enlarge the eco system of infrastructure equipment and user/terminal devices
- Develop an approach that allows flexibility in the synchronization of private, local TDD networks with a purpose to properly support the varying uplink – downlink ratios as seen for different verticals/enterprises/use cases. Such approach should optimize spectral efficiency and avoid the one-size-fits-all limitations.
- Develop a recommendation for harmonise protection measures for satellite operation in the 3.8-4.2GHz band with a purpose to enable the use of local private networks in that band in all EU member states.
- Make use of interest groups to develop a better understanding of the various critical communication needs of enterprises and other organizations.