

Public Consultation on the draft RSPG Work Programme for 2018 and beyond

ETNO Contribution

The European Telecommunications Networks Operators' Association (hereinafter ETNO) welcomes the opportunity to provide its views on the draft RSPG Work Programme for 2018 and beyond.

ETNO's response mainly focuses on two sections of the Work Programme, namely: "Peer review and Member State cooperation on authorisations and awards" and "5G Implementation Challenges". In addition, ETNO would like to suggest a new work item: "RSPG benchmark on spectrum fees".

Peer review and Member State cooperation on authorisations and awards

ETNO acknowledges that the Peer Review Platform collects very valuable information on spectrum awards. Considerable benefits can be derived from sharing best practices across Member States which will be further improved if also other stakeholders have the possibility to contribute. We believe that a number of award processes in the past would have benefitted from a peer review mechanism, which would have enabled a more efficient allocation of resources, hence, swifter and less costly for the ultimate benefit of end-users.

ETNO recognises that RSPG is a group gathering EU Member States, however an approach similar to the one of ITU should be considered, enabling a proper representation of the industry and of the other key groups of interest.

Furthermore, up to now, the work on Spectrum Awards and the Peer Review platform is based only on a voluntary sharing of knowledge. Neither the conclusions nor the best practices that Member States should follow are subsequently shared. In order to deliver consistent services to consumers across Europe, RSPG should urge all member states to participate in the peer review process, as well as add a transparency mechanism.

In addition to that, ETNO would like to reiterate its support for the "Peer review process" as initially proposed by European Commission in the frame of European Electronic Communications Code (EECC). The peer review should be a mandatory mechanism to increase consistency and efficiency of spectrum management and licensing among EU Member states, rather than a forum or platform.

5G Implementation Challenges

The 2016 "RSPG first opinion on the strategic roadmap towards 5G for Europe" paved the way for the introductory steps for 5G. ETNO welcomes the "Draft RSPG second opinion on 5G

networks” currently under consultation as natural step in this direction, as well as its follow up expected in 2018-2019.

For Europe to lead on the deployment of 5G, a regular follow up on implementation challenges is needed.

In addition to the identification of appropriate spectrum bands for the deployment of 5G, further steps are needed for encouraging 5G investments through the necessary spectrum policy harmonization and predictability across Member States.

In this regard, we consider that some aspects such as increased licence duration, deadlines for releasing new spectrum bands, spectrum fees and auction design should be consistent among Member States.

ETNO appreciates RSPG efforts on 5G and WRC-19, but also would like to encourage RSPG to envisage a long term strategic plan for European spectrum policy planning, including the provision of new bands to be studied in the following WRC study periods.

Proposition for a new work stream: RSPG benchmark on spectrum fees

ETNO would also like to propose a new work item, “RSPG benchmark on spectrum fees”.

Some key elements such as spectrum fees, yearly or one-time, and the algorithm of calculation, vary considerably among Member States. At the same time, spectrum fees are one of the factors that would encourage, or not, 5G investments. Therefore, in order to facilitate a smooth deployment of 5G networks, ETNO would like to suggest a new work stream that will firstly identify the differences among Member States and then will propose best practices.

Finally, ETNO is pleased to continue to cooperate with the RSPG. For that purpose, ETNO would like to encourage RSPG to engage more frequently with the industry and to strengthen transparency on the decision making.