

ETNO Common Position commenting on the Work Programme of the Radio Spectrum Policy Group (RSPG)

Executive Summary:

ETNO considers the proposed 17-point RSPG Work Programme to be complete, requiring no additional points. This paper offers comments on each of the work items, paying particular attention to wireless access platforms, convergence with digital broadcasting and spectrum trading.

ETNO has a strong interest in RSPG work and is looking forward to a close cooperation with the group in the future.

General comments

ETNO members operate numerous radio services over a wide range of the radio spectrum and are affected by almost all of these topics. Therefore, ETNO has a strong interest in being involved in the work of the RSPG and looks forward to a close dialogue.

The creation of a public web site for the RSPG is welcomed. This creates a certain degree of transparency, while improving the flow of information to spectrum users and other interested parties.

A first step for involving industry in RSPG's work is giving it the possibility to comment on the RSPG's work programme. The programme covers a variety of topics related to radio frequency spectrum in the medium to long term. ETNO currently is not aware of any issue that could be added to the draft Work Programme, but we assume it would be possible to propose to RSPG new topics when found necessary. ETNO notes therefore that the RSPG's program is subject to periodic review.

More generally, and to refer to the mandate of the RSPG, ETNO members believe that there should be no overlap between RSPG's work and issues under the responsibility of other relevant groups dealing with spectrum matters.

Comments on work items

Radio spectrum requirements for Community policies

Several topics in this chapter are connected with WRC agenda items, regarding either the implementation of the results of WRC-2003 or the preparation of WRC-2007. This relationship could be cited in the description of the topic to stress its relevance and time frame.

1. Radio spectrum for wireless electronic communications access platforms

Without doubt this is the most important topic in this chapter from the public network operators' point of view. It includes implementation of the results of several WRC-2003 agenda items in Europe, and the preparation of at least two agenda items of WRC-2007. Moreover, additional aspects will need to be considered.

ETNO notes that the European Commission has already issued a mandate to CEPT on frequency arrangements for the 2.6 GHz UMTS/IMT-2000 extension band and is considering similar measures with regard to RLAN in the 5 GHz bands. ETNO will contribute to the work within CEPT and is highly interested to be involved in strategic discussions within RSPG.

→ Priority for ETNO: very high

2. Convergence of wireless electronic communications and broadcasting; impact of digitalisation of broadcasting

This also holds major interest for ETNO. Almost all ETNO members operate mobile networks, while several also operate broadcasting networks. ETNO fully endorses the significance of open interoperable solutions for digital-TV and 3G, as this will facilitate and accelerate access to information society services. Open interoperable solutions are necessary to create a critical mass of useful and attractive services and applications, and to achieve economies of scale.

Currently, the sector's main focus is on the preparation on the Regional Radiocommunications Conference (RRC) for which the Commission initiative might come a bit late.

→ Priority for ETNO: high

3. Space strategy

With regard to Radio Navigation Satellite Services, ETNO operators are indirectly affected by this issue, in particular regarding the possibility to use an alternative Radio Navigation System to offer location-based services to their customers.

Moreover, the possibility to complement terrestrial networks with satellite systems is also considered with interest by some ETNO members.

→ Priority for ETNO: medium to high

4. Road safety

This topic covers the introduction of automotive collision-avoidance radars. ETNO has a specific interest to protect the fixed service operation in the 23/26 GHz bands from harmful interference.

The Commission issued a mandate to CEPT whose work has already reached an advanced state. ETNO would like to reiterate its opinion that moving to the band 76-81 GHz (the range 76-77 GHz is already harmonised worldwide) is the appropriate way forward.

→ Priority for ETNO: depends on the decision on frequency band usage

5. Short range devices (SRD, such as wireless tags, medical telemetry)

ETNO operators are not directly affected.

6. Public Protection / Disaster Relief (PPDR)

This topic could have implications for network operators if public networks are included in the considerations. ETNO is of the opinion that the provision of PPDR applications via commercial networks is a matter of negotiations between governmental organisations and public network operators, and that no regulatory obligations should apply.

→ Priority for ETNO: depends on the overall strategy

7. Single Sky Policy

ETNO operators are not directly affected.

8. Maritime Policy

Only some ETNO operators are directly affected.

9. Scientific use of spectrum

ETNO operators are not directly affected. However, the introduction of new technologies such as Ultra Wide Band (UWB) will have an impact on many radio services. These aspects are covered by topic 15 of the RSPG WP.

Practices and developments in radio spectrum management

10. Spectrum trading

Spectrum trading is one major measure to manage frequency spectrum. However, its suitability depends on a number of circumstances, e.g. the actual usage of the frequency band concerned, possible licence conditions, etc. Moreover, spectrum trading can be implemented in different ways, meaning that a clear definition is absolutely necessary, as is an appropriate and harmonised regulatory framework. The aim of achieving a more efficient use of radio spectrum should have priority. ETNO follows with interest the consultation initiated by the Commission and will contribute to it.

→ Priority for ETNO: very high

11. Information on availability and usage of radio spectrum

ETNO understands that the Commission has invited tenders for a study on 'information on the allocation, availability and use of radio spectrum in the Community'. The current available EFIS does not provide details on actual utilisation. Even within many of the national frequency tables available from CEPT member states these details are missing.

The availability of further utilisation details - particularly in a common format - is desirable. However, details should be made available only so far as commercial confidentiality is respected.

→ Priority for ETNO: high

12. Spectrum refarming and relocation issues

ETNO considers refarming to be an important element in adapting spectrum use to the evolution of markets and technologies. A clear distinction should be made between refarming of services and refarming of frequencies. Decisions on refarming must take into account investments already made by giving sufficient time to operators to recover costs and generate a profit.

→ Priority for ETNO: medium to high

13. Allocation guidelines

The draft work programme's explanation "Consider approaches to ensure technology neutrality; assess competition and single market implications" does not seem to fit the title of this topic. The points mentioned in the explanation are, from our point of view, covered by the current relationship between the EU, CEPT and ETSI, e.g. with mandates to CEPT on ECC Decisions and mandates to ETSI on the preparation of harmonised standards under the R&TTE Directive.

14. Adapting regulatory legacy at Community level to new radio spectrum policy approach

According to the draft Work Programme's explanation, this topic seems to be connected with topic 12 "Spectrum refarming and relocation issues". If so, these two subjects should be merged.

→ Priority for ETNO: medium to high

15. Technology developments impacting on radio spectrum management (e.g. UWB, soft-ware radio; mitigation techniques for licence exempt spectrum)

This is a very interesting and important topic because it affects almost all current radio services. A harmonised approach seems only possible if it is implemented in the Radio Regulations. However, a corresponding proposal for the agenda of WRC-2007 was rejected.

A first discussion on this issue took place at the workshop “Advanced wireless technologies: Implications for spectrum management” on 10 October 2003 in Brussels where new ideas and concerns from spectrum users were presented.

ETNO will keenly follow the further developments on this matter .

→ Priority for ETNO: medium to high

Support to other spectrum policy aspects

16. International developments

From ETNO's point of view the ITU World Radio Conferences and the resulting amendments to the Radio Regulations - which are the basis for all radio spectrum utilisation, - are of highest interest. In order to fully secure Europe's frequency interests, all parties should aim for collaboration as fruitful as that achieved for the WRC-2003's preparations.

Additionally, the planning conferences for Europe, e.g. the forthcoming RRC on the re-planning of the Stockholm'61 plan, are of interest for ETNO members..

→ Priority for ETNO: high

17. Relationship civil / defence usage of radio spectrum

In some European countries, frequency bands designated for pan-European services are still used by the military. There should be a strategic review that aims to set time scales for the military to release these bands. Furthermore, possibilities for shared civil/military use should be investigated.

→ Priority for ETNO: high