



## VCI-response to the Draft RSPG Opinions on

- Spectrum Sharing – Pioneer initiatives and bands (RSPG21-006 FINAL)
- Additional spectrum needs and guidance on the fast rollout of future wireless broadband networks (RSPG21-008 FINAL)
- A Radio Spectrum Policy Programme (RSPP) (RSPG21-014 FINAL)

### Motivation

The VCI represents the politico-economic interests of around 1,700 German chemical companies and German subsidiaries of foreign businesses. For this purpose, the VCI is in contact with politicians, public authorities, other industries, science and media. In 2019 the German chemical industry realized sales of over 198 billion euros and employed around 464,000 staff.

### Comments

#### 2.1 General comments

- VCI highlights the importance of dedicated spectrum access for vertical industries as a key enabler to give companies a competitive advantage and promote new business models. 5G is necessary to deliver on the value proposition of Industry 4.0 (modularity, flexibilization of production) and leverage significant efficiency and quality potential in industrial manufacturing. Therefore, 5G gives European companies, often small and medium-sized, the potential to expand the world market leadership in the area of factory and process automation and must therefore always be seen in the context of the global "Industry 4.0" brand. The same applies to some extent to other industrial and economic sectors (e.g. agriculture).

#### 2.2 Comments on “a Radio Spectrum Policy Programme (RSPP)”

- VCI agrees with RSPG that there is no “one-size fits all” solution. Different types of authorization methods and regimes facilitate innovation.
- Many kinds of cooperation models are possible (from using a network slice in Mobile / Fixed Communication Network (MFCN) to a local licensed network operated and owned by industry)
- Local licenses are the key to this flexibility, but nomadic, time-limit use needs further flexibility.

#### Section 1:

- VCI fully agrees with the goal that the RSPP should support key Union policy areas such as the European Gigabit Society, the European Green Deal, New industrial strategy for Europe and Shaping Europe’s Digital future.

## Section 2.2:

- VCI underlines the importance of access to licensed spectrum for vertical industries. We see different solutions for the provision of local networks (mobile operators, third parties or local users themselves) which fosters competition and hence innovation.
- For the manufacturing industry, spectrum is only an enabler for a business case, not a business model as such (in contrast to the business model of mobile network operators). In our opinion it is of utmost importance that a local user has the possibility to get dedicated spectrum at reasonable cost. The best way for addressing this need is dedicated spectrum for industries, like in Germany or the UK.
- For the manufacturing industry, it would be ideal to have a harmonized band for local networks (e.g. easiest cross-border rollout across the EU). However, full spectrum harmonization is not the only way forward to allow local networks. The industry is flexible to use different segments e.g. of the mid-band and of the mm-Wave range in different Member States. The only precondition is that these segments in each band are supported by the same chipsets, communication modules and devices, and that such segments are available in all Member States.
- VCI supports that RSPG encourages Member States to digitalize processes for spectrum application and granting, especially for local users.

## Section 3:

- VCI highlights that 5G is a main driver in making the value propositions of Industry 4.0 happen, contributing to a large scale to the above-mentioned key policy programmes. Therefore, the RSPG should consider adding a dedicated section to chapter 3 'Spectrum needs and supporting EU vision/policies' for the manufacturing industry or to have it at least explicitly mentioned in section 3.1.

## Section 3.1:

- The RSPG is correct when it states that spectrum in the mm-Wave range is an important building block for industrial vertical use. Nevertheless, it is important to emphasize that also about 100 MHz of spectrum is necessary in frequencies below 6 GHz (as e.g. in Germany 3.7-3.8 GHz) due to coverage aspects.

## 2.3 Comments on "Additional Spectrum needs and guidance on the fast rollout of future wireless broadband networks"

- RSPG Opinion 2: VCI shares the views of the RSPG and understands the reasons behind the heterogeneous way that spectrum needs have been handled at national level. However, we would like to encourage the Member States to consider the needs of all verticals when assessing and setting priorities for efficient spectrum use.

- RSPG Opinion 3: VCI can confirm the interest of the manufacturing sector in mm-Waves. However, it is important to understand that the interest of manufacturing in mm-Waves does not reduce the importance of e.g. mid-bands for our vertical industry.
- RSPG Opinion 5: VCI fully agrees that the right balance between different types of authorization methods would facilitate innovation and different technologies.
- RSPG Opinion 6: VCI welcomes the initiative for studies of 3.8-4.2 GHz for local vertical applications. We want to highlight that verticals may need at least 100 MHz of continuous spectrum. Although the targeted range is much broader, it is not clear if there will be sufficient spectrum available. This initiative should therefore not lead to the exclusion of other frequency ranges for local licenses below 6 GHz.

Additionally, we express that it is not necessary to have one “fixed” harmonized band for local verticals throughout all Member States but to have at least 100 MHz in the mid-band range that can be handled by the same chipset (to ensure economies of scale). The same applies for the 60 GHz range (cf. Annex II.I Bullet 1).

- RSPG Opinion 7: We support and welcome the RSPG recommendation to develop different options to address the vertical needs in the mm-Wave range. The German model on spectrum application and access could be used as a role model for other Member States.
- As an important general remark, we would like to emphasize that, so far, chipsets and hence communication modules and devices supporting IMT technologies for local networks are not readily available. Therefore, we expect a higher demand for dedicated spectrum by verticals in the next years.
- Section II presents the result of the QoS/Quality of Experience (QoE) KPI survey. A reference to "continuity of service" should be added. What is meant by this is that such KPIs are usually measured/displayed across the board over a larger space. However, the benefit of many mobile communication solutions also depends on whether a minimum performance (which depends on the respective use) can be delivered permanently, i.e., spatially/temporally. Gaps would therefore not necessarily show up in a lump sum figure, but they would affect usage. Similarly, QoS/QoE are related to the individual user experience, thus disregarding the aspect of capacity or load background, which also depends on the respective use case.

## 2.4 Comments on “Spectrum Sharing – Pioneer initiatives and bands”

- Introduction: VCI agrees with the RSPG view that so far Spectrum Sharing in the Union is implemented in a static and conservative way. We welcome the initiative from the RSPG to explore innovative sharing solutions to make a more efficient use of the spectrum. We want to highlight that Quality of Service requirements of vertical industries must be met at any time and that dedicated spectrum for local licenses is the best way to meet these requirements.

- 3.: VCI welcomes network slicing as one solution for verticals. Nevertheless, we would like to emphasize that network slicing is not possible for all industrial applications e.g. because of privacy, liability, availability issues.
- 4.: VCI supports the principles of “use-it-or-share-it” as long as priority of local licenses is always ensured (as it is the case in Germany).
- 8.: VCI wants to highlight that access to spectrum is key to boost innovation and efficiency in a wide range of vertical industries such as manufacturing.
- 17.: VCI can confirm that also a multi-tier approach is possible. For industry it is important to have a dedicated spectrum for local licenses. As long as priority for local licenses is always ensured, also a secondary use by MFCN would be possible if there is no use by local licenses in a certain region.
- 18.: VCI welcomes that the RSPG considers all available spectrum bands as potential candidates for introducing and enhancing spectrum sharing solutions as long as a priority for local licenses is always ensured.
- 31.: VCI supports the approach that local licenses should be granted under a light licensing regime.

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- The VCI is registered in the “public list on the registration of associations and their representatives” of German Parliament (Deutscher Bundestag).

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