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DIGITALEUROPE's Response to the Public Consultation on the RSPG Work Programme for 2024 and Beyond



Executive summary

DIGITALEUROPE welcomes the opportunity to comment on the 'RSPG Work Programme for 2024 and Beyond' as part of the RSPG's transparent communication and cooperation with stakeholders. We hope for ample opportunities to provide useful contributions on spectrum matters relevant to the European Union (EU) and its businesses and citizens. General gigabit connectivity, also enabled by timely and sufficient spectrum allocation, is essential to be available to everyone by 2030.¹

¹ 'Europe 2030: A Digital Powerhouse. 20 solutions to boost European tech leadership and resilience'. <https://www.digitaleurope.org/resources/europe-2030-a-digital-powerhouse-digitaleuropes-manifesto-for-the-next-commission/>



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Peer Review and Member States Cooperation

This process has bolstered improvements to exchanges between Member States and stakeholders in the past, especially regarding the timely access to spectrum for wireless broadband electronic services (WBB ECS) under comparable conditions in Member States. Certain delays in implementing 5G pioneer bands, as documented by e.g., the 5G Observatory, indicate that continuation of these activities is valuable towards better harmonisation of timelines of spectrum releases and their conditions towards a better functioning single market.

Subsequently, we support the continuation of Peer Review and Member States Cooperation in the RSPG 2024 Work Programme, and encourage the RSPG to continue the release of the annual reports and organising stakeholder workshops to improve communication and knowledge exchange between industry and administrations.



WRC

There is a clear benefit in coordinating WRC positions within the EU and CEPT, as harmonisation is key for large ecosystems with affordable services and devices. Consequently, evaluation of the WRC-23 outcome and planning for positioning towards WRC-27 need to be considered from 2024 onwards, resulting in a Final Opinion well ahead of the Conference. DIGITALEUROPE therefore supports the planned timeline and looks forward to contributing to the process as a stakeholder.



Good Offices

The RSPG Good Offices function has proved itself advantageous to making spectrum available early on. This is especially true considering diverging circumstances on national level in Member States, and even more importantly, along borders in the EU. DIGITALEUROPE expects a need to extend this task beyond 2024/2025 to address additional flexibility in 470-694 MHz, both within the EU and towards its neighbours.



Long-term Vision for the Upper 6 GHz Band

The upper 6GHz band is of utmost relevance for various services and thus supports the RSPG in its ambition to work towards a long-term vision.

In addition, the studies on the future use of the band that are being carried out by the RSPG and on national level are followed with great interest. In this light, we encourage the RSPG to develop a short-to-medium term strategy for the upper 6GHz band, including supporting activities relating to MFCN, WAS/RLAN, and possible hybrid sharing between MFCN and WAS/RLAN to enable additional use in within the 2024-2030 timeframe.



6G Strategic Vision

DIGITALEUROPE considers 6G to be a necessary evolutionary step to benefit from further advances in semiconductor technology, allowing to process more RF bandwidth and more antenna elements. The next-generation technology will enable further enhancement of the economic and the energy efficiency of WBB ECS networks and offer ever-better service affordably to consumers. Besides, it facilitates a reduction of the impact on climate change by limiting its ecological footprint and allowing other sectors to massively reduce their energy needs. European 6G flagship research programmes such as Hexa-X, Hexa-X II, etc. are already advanced in several areas including sustainability, inclusion, and trustworthiness. Whilst these efforts are ongoing, Europe should define a strategic vision on 6G spectrum needs, and eventually bands to meet those needs, in a timely manner as done for 5G with the EU pioneer bands. Consequently, DIGITALEUROPE considers an EU strategic vision to be necessary, and offers its competence to contribute to this process.



Future Use of 470-694 MHz

We see a clear need to allow more flexibility in the band 470-694 MHz and have expressed our position towards a co-primary mobile allocation.² DIGITALEUROPE supports this item to be included and is ready to contribute to the RSPG activities planned in the RSPG work programme for 2024 and beyond.



Strategic Spectrum Matters

DIGITALEUROPE welcomes the strategic initiatives of RSPG and is ready to contribute as appropriate.

² See, for example, [https://radio-spectrum-policy-group.ec.europa.eu/document/download/6cb17632-9aba-4a15-ae9-28b9d272d9ed_en?filename=RSPG23-035final-RSPG Opinion on UHF beyond 2030.pdf](https://radio-spectrum-policy-group.ec.europa.eu/document/download/6cb17632-9aba-4a15-ae9-28b9d272d9ed_en?filename=RSPG23-035final-RSPG%20Opinion%20on%20UHF%20beyond%202030.pdf)

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About DIGITALEUROPE

DIGITALEUROPE is the leading trade association representing digitally transforming industries in Europe. We stand for a regulatory environment that enables European businesses and citizens to prosper from digital technologies. We wish Europe to grow, attract, and sustain the world's best digital talents and technology companies. Together with our members, we shape the industry policy positions on all relevant legislative matters and contribute to the development and implementation of relevant EU policies, as well as international policies that have an impact on Europe's digital economy. Our membership represents over 45,000 businesses who operate and invest in Europe. It includes 106 corporations which are global leaders in their field of activity, as well as 41 national trade associations from across Europe.

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Membership

Corporate Members

Accenture, Airbus, Applied Materials, Amazon, AMD, Apple, Arçelik, Arm, Assent, Autodesk, Avery Dennison, Banco Santander, Bayer, Bosch, Bose, Bristol-Myers Squibb, Brother, Canon, CaixaBank, Cisco, CyberArk, Danfoss, Dassault Systèmes, DATEV, Dell, Eaton, Epson, Ericsson, ESET, EY, Fujitsu, GlaxoSmithKline, Google, Graphcore, Hewlett Packard Enterprise, Hitachi, Honeywell, HP Inc., Huawei, ING, Intel, Johnson & Johnson, Johnson Controls International, Konica Minolta, Kry, Kyocera, Lenovo, Lexmark, LG Electronics, LSEG, Mastercard, Meta, Microsoft, Mitsubishi Electric Europe, Motorola Solutions, MSD Europe, NEC, Nemetschek, NetApp, Nintendo, Nokia, Nvidia Ltd., Oki, OPPO, Oracle, Palo Alto Networks, Panasonic Europe, Pearson, Philips, Pioneer, Qualcomm, Red Hat, RELX, ResMed, Ricoh, Roche, Rockwell Automation, Samsung, SAP, SAS, Schneider Electric, Sharp Electronics, Siemens, Siemens Energy, Siemens Healthineers, Skillsoft, Sky CP, Sony, Sopra Steria, Swatch Group, Technicolor, Tesla, Texas Instruments, TikTok, Toshiba, TP Vision, UnitedHealth Group, Visa, Vivo, VMware, Waymo, Workday, Xerox, Xiaomi, Zoom.

National Trade Associations

Austria: IOÖ
Belgium: AGORIA
Croatia: Croatian Chamber of Economy
Cyprus: CITEA
Czech Republic: AAVIT
Denmark: DI Digital, IT BRANCHEN, Dansk Erhverv
Estonia: ITL
Finland: TIF
France: AFNUM, SECIMAVI, numeum
Germany: bitkom, ZVEI

Greece: SEPE
Hungary: IVSZ
Ireland: Technology Ireland
Italy: Anitec-Assinform
Lithuania: Infobalt
Luxembourg: APSI
Moldova: ATIC
Netherlands: NLdigital, FIAR
Norway: Abelia
Poland: KIGEIT, PIIT, Digital Poland Association
Portugal: AGEFE
Romania: ANIS

Slovakia: ITAS
Slovenia: ICT Association of Slovenia at CCIS
Spain: Adigital, AMETIC
Sweden: TechSverige, Teknikföretagen
Switzerland: SWICO
Turkey: Digital Turkey Platform, ECID
Ukraine: IT Ukraine
United Kingdom: techUK