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## **Radio Spectrum Policy Group**

### **GSA<sup>1</sup> Response to the Public Consultation on the Draft RSPG Work Program for 2024 and beyond**

GSA appreciates the possibility to comment on the RSPG's draft Work Programme for 2024 and beyond.

If any additional clarifications are required for this response, please do not hesitate to contact: Sverker Magnusson ([sverker.magnusson@ericsson.com](mailto:sverker.magnusson@ericsson.com)), Chair GSA CEPT Spectrum Group.

## **Introduction**

The GSA ([www.gsacom.com](http://www.gsacom.com)) appreciates the possibility to comment on the RSPG's draft Work Programme for 2024 and beyond as part of RSPG's transparent communication and cooperation with stakeholders to inform on and seek inputs on the foreseen activities by RSPG in the coming two years period (2024-25). GSA acknowledges the RSPG's role of improving cooperation with industry stakeholders, and we therefore encourage RSPG to continue and intensify the exchanges with the stakeholders through regular workshops in addition to the usual public consultations on the RSPG Opinions and Reports. GSA is reaffirming its interest to contribute as a relevant stakeholder on spectrum matters of

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<sup>1</sup> The GSA (Global mobile Suppliers Association, <https://gsacom.com>) develops strategies and plans, and contributes studies and technical analysis to international, regional and individual country policymakers and regulators to facilitate the timely availability of spectrum for use by mobile network operators. GSA has a focus group for spectrum topics for technical and regulatory matters of radio spectrum pertaining to the successful evolution of International Mobile Telecommunication (IMT) and associated radiocommunication systems and comprises a team made up of spectrum and regulatory affairs specialists from GSA Executive Member and GSA Member companies. In addition, GSA reports regularly on global spectrum developments.

importance to wireless mobile communications for the EU and its businesses and citizens. Below you will find GSA's comments on each of the proposed activities of RSPG.

### **Peer review and Member States cooperation on authorisations and awards**

GSA considers that clarity in spectrum availability and award plans in the Member States, together with known conditions of the authorisation regimes and the associated technical characteristics, play a key role to ensure the planning of equipment development and supply in response to the market demands. We are of the view that the peer review process has been instrumental in improving the exchanges and cooperation between Member States and between Member States and stakeholders regarding the timely access to spectrum for WBB ECS services under comparable conditions among Members States. Its role therefore should continue, and for the transparency of this process we encourage RSPG to continue organising workshops on awards and allow for more collaboration with the industry, in particular with the involvement of those stakeholders to whom usage rights are granted. We equally encourage RSPG to continue the release of its annual reports, and to act towards improving communication and knowledge exchange between industry and administrations.

Regarding the implementation-of the 5G primary and pioneer bands, we note that delays exist – as documented by the EC's 5G Observatory. This situation likely indicates that continuing the peer review activities could be valuable towards accelerating the calendar of spectrum releases and the associated conditions towards a better harmonised single market. GSA sees therefore scope in continuing the peer review process and Member State cooperation on authorisations and awards in the 2024-25 period under the RSPG Work Programme.

### **WRC-23**

GSA sees a clear role for RSPG in coordinating positions with reference to the WRC Agenda Items within EU and CEPT as harmonisation is key for enabling large ecosystems, with affordable services, equipment, and devices. The review of the outcomes of the ongoing WRC-23 regarding issues of relevance to the EU spectrum policies should follow the regular post-WRC analysis, as well as the identification of main themes for WRC-27 planning. As such, we agree that both activities should be included in the 2024 program. While RSPG's planned reporting of the outcomes of WRC-23 is clearly defined, we see scope for RSPG to consider stakeholders' views – both administrations and industry – when stating the main EU themes and positions for WRC-27.

GSA recommends RSPG to consider, when defining the EU objectives for WRC-27, the evolution of next-generation mobile (IMT-2030) and wireless access systems and the associated spectrum needs to achieve the EU 2030 connectivity. GSA supports the planned timeline and encourages RSPG to engage with stakeholders as part of its processes towards WRC-27.

### **Good offices**

RSPG's "good offices" has proven to be instrumental in dealing with aspects related to spectrum releases and cross-border network deployment, cooperation, and coordination

with neighbouring countries. GSA sees this part of the work programme to be very relevant for timely release of spectrum, considering the individual national circumstances along the borders both between Member States and Member States and non-EU countries. Within the period 2024-2031 and depending on the outcomes of WRC-23 on AI 1.5, GSA expects that the “good offices” will extend its work to cover the flexibility option within the 470-694 MHz band in the EU and towards EU’s neighbours.

### **Long-term vision for the upper 6 GHz band**

GSA agrees with the analysis of RSPG regarding the competing industry demands and interests in the upper 6 GHz band, as well as the fact that future work should consider both outcomes of WRC-23 and ongoing and/or scheduled work in CEPT.

We are of view that this work should target a short-to-medium term strategy (for the 2024-2030 period) given the interest the industry shows and aligned with the WRC-23 outcomes, as well as the longer-term perspective including the debates on spectrum for 6G/IMT-2030. The GSA encourages the involvement of the relevant industry stakeholders from the very beginning of the process, e.g., through stakeholder workshops.

### **6G strategic vision**

GSA encourages RSPG to take a proactive approach towards a European 6G spectrum strategy, leveraging its previous positive 5G spectrum strategy experience which has led to the timely definition of the 5G primary and pioneer bands. GSA therefore recommends that RSPG considers the implications of spectrum for 6G at this early stage and to work on defining a 6G “spectrum roadmap” within the next two years, establishing the bands and conditions for fast rollouts across the EU as early as 2030.

In line with RSPG’s proposals, GSA supports further work to assess the coverage and capacity needs for 6G use cases and usage scenarios and the associated role of existing spectrum. In particular, 5G licence durations should also be carefully considered since the Union should aim at consistent timelines for the introduction of 6G networks to foster the required economies of scale.

GSA supports the development of an initial RSPG Report, including the evaluation of coverage and capacity needs for 6G use cases and usage scenarios, with initial considerations on a 6G “spectrum vision” taking into account the outcomes of the WRC-23 and the new priorities of the WRC-27 as set by the Conference in Dubai. This could aim towards the finalization of an RSPG Opinion on the 6G spectrum strategic vision within the first half of 2025.

GSA recommends that RSPG accounts for ongoing activities in other regions and the need for Europe to influence global developments. The GSA also encourages the involvement of the relevant industry stakeholders from the very beginning of the process.

### **Future use of 470-694 MHz**

GSA is favouring regulatory flexibility in the 470-694 MHz band and has expressed its position towards a co-primary mobile allocation in the previous RSPG consultation, and the possibility for the band to be used, where available, for other than broadcast purposes,

without interfering with the incumbent users of the band. GSA applauds the RSPG idea to assess the prospects of each Member State in the decade 2030-2040 as it has been made clear during WRC-23 preparations that the national needs within this band differ within Europe.

As such, GSA restates its support and readiness to engage in further planned activities of RSPG under its 2024-25 work programme.

### **Strategic Spectrum Matters**

GSA notes RSPG's intentions to follow the Digital Decade process, the possible evolution of the regulatory and policy framework for ECS, and any other strategic spectrum matters that may need consideration. GSA welcomes this strategic initiative of RSPG and looks forward to contributing as appropriate on matters of relevance for the mobile industry.

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