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GSMA Europe response

**RADIO SPECTRUM POLICY GROUP OPINION ON THE COORDINATION
OF EU SPECTRUM INTEREST**

**Regarding both the preparatory process for ITU World Radio communication
Conferences (Part 1) and The main themes of WRC-11 of interest for EU-Wide
support (Part 2)**

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Summary

GSMA Europe would like to thank the Radio Spectrum Policy Group (RSPG) for giving stakeholders the opportunity to comment on their draft Opinion on World Radio communication Conference (WRC) preparations and, in particular, the preparations for the next WRC.

In response to the public consultation we would like to make the following points:

1. GSMA Europe considers that an **increased focus on consensus building and inter-regional coordination** will increase the chances of a successful outcome at future WRCs;
2. GSMA Europe supports that **both the EU and CEPT should give more emphasis on WRC decisions** that facilitate coordination at the borders of the EU;
3. GSMA Europe needs to **address such issues which are not assigned to the community policies other than “Electronic Communications”**; and
4. GSMA Europe favours **NOC (no change) in the Radio Regulations regarding AI 1.17**
5. Moreover, the EU should continue with its efforts to **harmonise the use of 790-862 MHz band in Europe for the mobile service.**

Arguments underpinning this point are detailed overleaf.



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General Remarks

The World Radio communication Conferences (WRCs) of the ITU and its decisions are of utmost importance for the mobile industry. As a worldwide institution it should focus on worldwide-harmonised solutions as much as possible in order to maintain its position towards regional institutions. Harmonised global allocations enable economies of scale, which are of particular importance to future IMT mobile services. In this regard past WRCs did not always meet the expectations of the mobile industry.

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Part 1

1.1 Preparatory Process

GSMA Europe highly appreciates the good cooperation between CEPT and EU in the European preparatory process for WRCs where all stakeholders are involved. In terms of the general preparatory process, GSMA Europe agrees that it is important to avoid the need for formal votes at a WRC. We also agree that a consensus-based approach is nearly always the best one. GSMA Europe supports the current approach to the adoption of European Common Proposals (ECPs), which requires at least 10 CEPT members to support such proposals with the opposition of less than 7 countries. To facilitate the development of inter-regional consensus prior to the WRC, we believe that it is becoming increasingly important for delegates from the different regional groups to attend and contribute to the discussion at other regions' preparatory meetings, even if their participation is formally identified as having observer status. GSMA Europe also considers it to be essential that the CEPT speaker for each Agenda Item at a WRC comes from a CEPT administration that is a co-signatory to the ECP. We note the seemingly increasing complexity of negotiations at each successive WRC where Agenda Items are "traded off" against each other. Finally, GSMA Europe also notes the difficulty that some EU Member States have when they are faced with potential duality of obligations relating to EU spectrum harmonisation decisions as well as the ITU Radio Regulations.

1.2 Recommendations

Regarding the specific recommendations proposed by the RSPG, GSMA Europe considers that an increased focus on consensus building and inter-regional coordination will increase the chances of a successful outcome at future WRCs (Recommendation 1). We agree that, if there are EU policy issues associated with Agenda Items, early involvement should be sought from all relevant European institutions as well as Member States (Recommendation 2), and that clear guidance should be developed, both through RSPG Opinions and the new multi-annual



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spectrum policy programme¹ (Recommendations 3 & 4). GSMA Europe agrees with the proposal (Recommendation 5) to raise political awareness of priority issues, where appropriate, at the regular summit meetings between the European Union and other regional bodies.

1.3 International coordination outside of the EU

GSMA Europe believes that the issue of coordination between the EU and neighbouring countries is important. We therefore supported the recommendation in the draft RSPG Opinion on the digital dividend for the EC to support Member States in renegotiating aspects of the GE-06 Agreement with countries outside the EU if required. More generally, GSMA Europe supports that both the EU and CEPT should give more emphasis on WRC decisions that facilitate coordination at the borders of the EU (Recommendation 7).

Part 2

2.1 Assignment of WRC-11 – Agenda Items to Community Policies

It should be clear that the assignment of a certain agenda item to a certain community policy does not mean that there is no relevance to another community policy. For example agenda item 1.4 deals with new allocations to the aeronautical mobile service (in the draft assigned to the section “Transport Policy”), but could have an impact on the mobile service below 960 MHz (which clearly belongs to the section “Electronic Communications”).

Due to the dense allocations to different services in several frequency ranges there is often an interrelation between different radio services. This could lead to a situation where an agenda item is in support of a certain community policy but simultaneously hampering another community policy.

This aspect needs to be taken into account and is the reason why GSMA Europe needs to address such issues, which are not assigned to the community policies other than “Electronic Communications”.

2.2 Community Policies

2.2.1 Information Society – Electronic Communications

Agenda Item **1.17** is one of the most important agenda items of the WRC-11 for the mobile industry. It deals with sharing studies between the mobile service and other services in the band 790 – 862 MHz in Regions 1 and 3. GSMA Europe favours NOC (no change) in the Radio Regulations concerning this agenda item. It is important for the mobile industry that no additional constraints are imposed on the use of the mobile service in this band. Moreover, the EU should continue with its efforts to harmonise the use of this sub-band in Europe for the mobile service.

¹ GSMA Europe assumes that this aspect of the revised regulatory package will finally be adopted.



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Some frequency bands discussed under agenda Item **1.5** could conflict with bands allocated to the mobile service. For example ENG stakeholders have identified the band 790-862 MHz as a potential frequency band for ENG. Even if it is intended to assign the spectrum on an individual authorisation basis it is hardly possible to use mobile service spectrum in a co-frequency manner with ENG applications.

Although only bands between 4 and 16 GHz are addressed in agenda item **1.25**, the use of the band 3.4-3.6 MHz has been proposed for new mobile satellite applications. GSMA notes that this band was identified as an IMT band at WRC-07 and we believe that this band will continue to be used by the terrestrial mobile service.

Regarding agenda item **8.2** (agenda of the WRC-15) GSMA Europe believes it is necessary to address the allocation of additional spectrum to the mobile service at WRC-15. At WRC-07 it was not possible to allocate a significant portion of world-wide harmonised spectrum for the future demand of IMT-Advanced which is intended to deliver data rates of up to 1 Gbit/s for nomadic use. 392 MHz of IMT spectrums were identified at WRC-07. This is only 30% of the ITU-R estimated need for additional IMT spectrum. As it was rejected to address this issue again at WRC-11, GSMA Europe supports the inclusion of a corresponding agenda item on the agenda for the WRC-15. The draft agenda for the subsequent WRC needs to be agreed by WRC-11 under agenda item 8.2.

2.2.2 Transport Policy

For agenda items **1.3** it should be safeguarded that the current and future (e.g. IMT) spectrum use of the mobile service is not endangered by the operation of "Unmanned Aircraft Systems (UAS)".

Agenda item **1.4** is dealing with new aeronautical mobile (R) service systems in different bands including the band 960-1164 MHz. This band is adjacent to the 900 MHz band (880-960 MHz). It is still not quite clear what systems and technologies will be applied in this band. Therefore it is of utmost importance that compatibility with mobile services in the 900 MHz band be closely examined in order to avoid interference to terrestrial mobile services.

Regarding agenda item **1.18** GSMA is of the opinion that the adjacent IMT band 2500-2690 MHz needs to be protected from interference.

2.2.3 Scientific use of Spectrum

No comments (no relevance of the agenda items mentioned in this section to the mobile service).

2.2.4 Introduction of more flexibility in the international regulatory framework

GSMA Europe welcomes the studies initiated under agenda item **1.2** on the introduction of more flexibility in the international regulatory framework. We would support the introduction of more flexibility as long as it is not counterproductive to the objective of worldwide harmonisation and interference free operation of radio services. Mass market radio services like the public mobile radio services (e. g.



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GSM, UMTS) require harmonisation first of all. This may of course be different for other applications and services where a more flexible approach could be more beneficial, in particular in conjunction with modern sharing technologies (e. g. cognitive radio).

The definition of different radio services in the ITU context was mainly related to the interference free coexistence of the different radio services. This principle should not be given up before the overall consequences for the efficient use of spectrum have been completely examined.

The introduction of modern spectrum sharing technologies, like cognitive radio, are welcome as they could improve efficient use of spectrum and open new possibilities for spectrum sharing. Agenda item **1.19** deals with the possible consequences for the regulatory framework when introducing intelligent spectrum sharing technologies like cognitive radio. This issue is of special importance for regulators and operators. GSMA Europe continues to have concerns with relying on cognitive technologies to detect and avoid other users, and the associated risk of causing harmful interference. These aspects need to be considered further.

Short range devices (agenda item **1.22**) are devices using low power levels, however they will be ubiquitous due to the high number of devices. Therefore the aggregated emission of SRDs could be significant. GSMA Europe notes that the SRD band 862-870 MHz could be a future problem to the future mobile service in the band 790-862 MHz. As SRDs are normally secondary services they are not allowed to interfere with primary services such as public mobile services. Appropriate measures should be taken to avoid interference in neighbouring bands due to aggregated emission and low cost filtering of SRD transmitters.

About the GSMA in Europe

The **GSMA** in Europe represents 171 operators in 51 countries/areas in Europe and counts around 600 million subscribers. Globally, the GSM Association represents over 700 operators in over 200 countries and counts around 3.8 billion subscribers (www.gsmeurope.org).