

BT RESPONSE TO THE CONSULTATION ON THE EU RADIO SPECTRUM POLICY GROUP (RSPG) 2010 WORK PROGRAMME

1. General comments

BT agrees that the list of work items already proposed by the RSPG for inclusion in its work programme for 2010 covers the appropriate issues, namely:

- Multi-annual radio spectrum policy programme
- Harmonised EU participation in international negotiations
- Digital Dividend
- Competition aspects in spectrum assignment and usage
- Technology impact on spectrum management
- Other issues and organisational issues

We note that many of the above items are closely inter-related and hence will need to be treated in a coherent manner with the relevant linkages identified within the separate deliverables of the various work items.

2. Specific comments on the work items

Digital Dividend

The description of the scope of the work item seems appropriate, but an additional point should be included to address the issues arising because of the limited amount of licensed mobile spectrum available in the context of the typical number of existing operators and potential new operators that may need to access this scarce spectrum resource. For example examination of the options for regulated wholesale access rights to networks where there is insufficient spectrum to accommodate all players, in order to promote competition. This aspect could also be addressed under the work item on **Competition aspects in spectrum assignment and usage**.

Technology impact on spectrum management

The description of the work item seems appropriate, but many other additional points could be useful to include, subject to available resources, e.g. a third workstream on the impact of femto cells and the spectrum requirements and spectrum sharing options that arise for these.

End