

ETNO response to the RSPG public consultation related to the draft Opinion on the coordination of EU spectrum interest



Preparation of ITU World Radio Communication Conference of 2011

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Executive Summary

The WRCs (World Radiocommunications Conferences) of the ITU-R and their decisions are of great importance for the mobile industry. Therefore ETNO agrees with the necessity to identify as early as possible the main agenda items of WRCs which are of particular interest for the EU policies, in a similar way to what happened for the previous WRCs.

In particular, among the WRC-11 Agenda Items, the most important from the operators' point of view are:

- Agenda Item 1.17: it is important that the mobile allocation of the sub-band 790-862 MHz is not changed for Europe.
- Agenda Item 1.2: a more flexible international regulatory approach is possible as long as it does not conflict with the objective of world-wide harmonisation and interference free operation of public mobile radio services (e. g. GSM, UMTS). The harmonisation requirements of these networks must be preserved.
- Agenda item 1.19: the introduction of new "cognitive" devices requires the regulatory studies to be performed before any change in the Radio Regulations is decided.

Introduction

ETNO welcomes the Radio Spectrum Policy Group invitation to express comments and views in relation to the draft RSPG Opinion on the coordination of EU spectrum interest.

The WRCs (World Radiocommunications Conferences) of the ITU-R and their decisions are of great importance for the mobile industry. Therefore ETNO agrees with the necessity to identify as early as possible the main agenda items of WRCs which are of particular interest for the EU policies, in a similar way to what happened for the previous WRCs.

Main Items

Information society – Electronic Communications

ETNO agrees that the Digital Dividend issue is particularly relevant for the EU, and that EU may work to ensure that no decision at WRC-11 would impede the harmonised deployment of mobile and fixed networks in this frequency band.

ETNO already expressed its position on Digital Dividend to RSPG in the reply to the consultation.

Agenda Item 1.17 is one of the most important agenda items of the WRC-11 for the mobile industry. It deals with the review of the WRC-07 decision to allocate a sub-band for the mobile service (790-862 MHz) in the digital dividend. It is important that this decision is not changed and that this sub-band is kept in Europe for the mobile service.

Regarding agenda item 8.2 (agenda of the WRC-15) it should be discussed whether 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 demand of mobile future generations (e.g. 4G, etc.) which is intended to deliver data rates of up to 1 Gbit/s for nomadic use. 392 MHz of IMT spectrum 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, the objective is to put a corresponding agenda item on the agenda for the WRC-15. This agenda needs to be agreed by WRC-11 under agenda item 8.2.

Flexibility and cognitive radio

ETNO welcomes the studies under agenda item 1.2 on a more flexible international regulatory approach as long as they do not conflict with

the objective of world-wide harmonisation and interference free operation of public mobile radio services (e. g. GSM, UMTS). The harmonisation requirement of these networks must be preserved.

The approach for other applications and services, where a flexible approach could be more beneficial, could be different, in particular referring to modern sharing technologies of Agenda item 1.19 (e. g. cognitive radio). These anyway still require the regulatory studies to be performed before any change in the Radio Regulation is decided.

Short-range devices

Short range devices (agenda item 1.22) are devices using low power levels however will be ubiquitous due to the high number of devices. Therefore the aggregated emission of SRDs could be significant. Especially the SRD band 862-870 MHz could be a future problem to the future mobile service in the band 790-862 MHz.

Therefore appropriate measures are to be taken to avoid interference in neighbouring bands due to aggregated emission and low cost filtering of SRD transmitters.

ETNO believes that the regulations of emissions by SRDs can be achieved with the proper ITU-R Recommendations, and consequently ETNO believes that there's no the need for WRC-11 to take a decision on SRDs

In any case, studies on emissions inside and outside ISM bands and effects on radio communication services of emissions from short-range devices are needed before any decision is taken regarding this issue

Mobile Satellite services

Possible additional allocations of spectrum to the mobile-satellite services is to be considered only if justified and without unduly constraining to existing, planned and future radio applications operated in the existing services.

Safety systems for ships and ports

ETNO believes that there is no need for any regulatory and / or allocation changes to be made at WRC-11 regarding frequency allocation to operation of safety systems for ships and ports and the related regulatory provisions

Changes to the Radio Regulations, and in particular the spectrum allocation tables, are not necessary for the introduction of new technologies for safety and security of ships and ports.

Any study on the issue could be conducted when the spectrum requirements would be proven.

Opinion of RSPG

ETNO completely agrees that modifying the Radio Regulations by World Radio Conferences is the final step of a process of consensus among the ITU Member States in order to preserve access to spectrum and orbit resources in all parts of the world without harmful interference, and to give to industry the necessary stability and predictability regarding the rules to be adopted in developing new services.

Consequently, we agree that Countries participating to WRCs should already reach an agreement on the main issues, during the preparation period between two subsequent conferences, to endorse the conclusions of the Conference in an official environment.

To this scope, coordination among European Countries is a key element, and European Common Proposals (ECPs) represent the basis to ensure consensus as much as possible avoiding multiple proposals by different European countries and to give more strength to European position in order to be shared with other regional Groups and to be approved by the Conference.

Therefore, we support that the European coordinator on each agenda item should be selected from a country having co-signed the corresponding ECP, since it ensures that CEPT views will be promoted by the best person in terms of expertise and motivations;

To get the objectives stated above, it's of primarily importance to identify, early in the WRC preparation process, the corresponding policy objectives and associated priorities, in order to facilitate the involvement of the political level for decision at the earliest possible stage;

So, we support the proposal of RSPG to develop and adopt an opinion for each WRC theme, proposing to the European Parliament, the EU Council and the European Commission "Common Policy objectives" for the corresponding conference.

Nevertheless, possible multi-annual spectrum policy programmes to be developed and adopted at EU level, in addressing policy issues related to WRC agenda items and providing guidance on strategic objectives, should take into account the peculiarity of each Country and the need of harmonization at a European level, in particular protecting the investments when deciding on flexible allocations of spectrum resources.

Finally, we agree that the EU and CEPT should give more emphasis on WRC decisions which facilitate coordination at EU borders.