

Reflection Document on the Radio Spectrum Policy Group 2010 Work Programme



January 2010

Executive Summary

ETNO expects that 2010 will be a challenging year for Member States from a regulatory point of view, focusing on the implementation of the new provisions on management and spectrum use as defined in the recently approved Telecom package.

Due to RSPG's new and enhanced role in this framework, ETNO believes that the RSPG 2010 Work Programme should provide guidelines for the evolution of the electronic communications regulations whereby it is important to seek continuity while improving the work developed in previous years.

In particular, ETNO thinks it would be useful to continue monitoring and supporting wireless broadband developments, which should be included specifically in the 2010 work programme. Wireless broadband access is an essential means in expanding the digital society and improving the commercial and economic potential of ICT. It is also a powerful tool to counter the digital divide gap.

Finally, ETNO believes that it is of a great importance that all stakeholders are given the possibility to comment on the RSPG Opinions, Reports and Papers in general. This is particularly relevant in the case of actions envisaged by the RSPG in connection with the first Multiannual Radio Spectrum Policy Programme.

Introduction

ETNO represents 41 leading European telecom operators from 35 countries and its member companies represent a significant part of the of total ICT activity in Europe. They account for an aggregate annual turnover of more than €250 billion and employ over one million people across Europe. ETNO companies are the main drivers of fixed

and mobile broadband and are committed to its continual growth in Europe.

ETNO view on the draft RSPG 2010 Work Programme

Multiannual Radio Spectrum Policy Programme

The new Multiannual Radio Spectrum Policy Programme will be a strategic planning tool for spectrum usage harmonisation in the next 2-3 years. Therefore ETNO believes that it is essential that it will be open to public consultation, in order to take advantage of industry views and proposals.

This tool represents a significant innovation in EU spectrum policy and it will have decisive implications for all industry stakeholders. ETNO considers that an early involvement of industry in the implementation of this new EU policy instrument would be of primary importance. The involvement of the RSPG would foster the development of a long term strategy, increase certainty over spectrum availability and therefore encourage long term investments.

Harmonised EU participation in international negotiations

ETNO completely agrees with the necessity to expand and to develop the policy issues related to the WRC agenda items identified in the 2009 RSPG opinion, providing guidance on strategic objectives during the next preparation phases and will contribute during the public consultation phase to present the industry point of view.

Any other form of international co-operation, as envisaged in the draft Work Programme, is welcome and should be promoted, including EU borders coordination issues.

Digital Dividend

ETNO agrees that the RSPG should concentrate on the implementation of the EU roadmap regarding the Digital Dividend, aim at fostering European harmonisation - which has already proven to have a positive economic effect - and move Europe towards a gradual use of more efficient and more versatile terrestrial broadcasting systems, taking into account real market needs¹.

ETNO supports the RSPG's view to assist Member States in their bilateral or multilateral negotiations with non-EU countries.

¹ See RD285 - ETNO Reflection Document on the Digital Dividend in Europe : <http://www.etno.be/Default.aspx?tabid=2066>

Competition Aspects in spectrum assignment and usage

ETNO welcomes the intention of RSPG to continue to monitor the activities related to the implementation of the GSM Directive. However ETNO is of the opinion that any reports, guidelines and/or deliverables produced by the RSPG on this issue should be open to public consultations. The competition aspects related to the development of new technologies requiring wide channels compared with the available spectrum, and consequently a low possible number of authorisations should be investigated in details.

ETNO welcomes any action favouring the harmonisation of spectrum management methods in the EU.

Technology impact on spectrum management

This item is really important as the evolution of technologies has a big impact on the telecommunications networks. However, ETNO believes that Cognitive Technologies as such are not, for the time being, appropriate solutions to get a more efficient spectrum management. A more balanced approach would be to include in the Work Programme the consideration of Member States granting individual rights-of-use for cognitive radio based systems, which have an undeniable economic advantage over licence exempt uses.

Other Work Items

ETNO is of the opinion that it would also be useful to keep alive the Working Group on Wireless Broadband. Unlike the past WG, it would be advisable to have the possibility to comment on its work through public consultations.

Conclusions

ETNO is pleased to continue to cooperate with the RSPG, and we would welcome a more open approach towards the sector than that proposed in the draft 2010 Work Programme.