

## ETNO Reflection Document commenting on the Draft ECC Report 152



August 2010

### Executive Summary

The 18 GHz band is heavily used by the fixed service in Europe for the terrestrial network infrastructure. And the use of this band is growing. Considering that lower frequency bands are more and more saturated, it provides operators with a unique opportunity to implement very high capacity links with long hop length.

The ECC has recently decided to review the ECC Report 003 (ECC Report 003: "Fixed Service in Europe. Current use and future trends Post-2002" – Lisbon, February 2002). This task is foreseen to be completed in the months to come and will give the opportunity to see what the real Fixed Service situation is in the 18 GHz band and what the future trends are for it, with a view to the frequency plans adopted.

After the completion of this revision task, it will be possible to understand whether there's room for uncoordinated Fixed Satellite Service terminals and, if so, the necessary compatibility studies required before any modification to the existing regulatory regime is decided.

As a consequence, ETNO strongly believes that any revision of the regulatory framework and in particular of the ERC Decision (00)07, that will constrain the radio relay network development in the 18 GHz band, should eventually be taken into account only after the completion of the ECC Report 003 revision and after detailed investigations on the compatibility issues.

## Introduction

ETNO is pleased to respond to the public consultation on the recently published ECC Report 152 (“Draft Report on the use of the frequency bands 27,5 - 30,0 GHz and 17,3 - 20,2 GHz by Satellite Networks”), in order to provide its comments and views in particular on the 18 GHz band.

Although ETNO understands the advantages of Ka band for satellite communications, the 18 GHz band is already heavily used to support the Fixed Service in almost all European countries. The radio links operated in this band are an essential part of the terrestrial network infrastructure operated by, but not only, our members. And the use of this band by the Fixed Service is growing.

Considering that lower frequency bands are more and more saturated, the 18 GHz band provides operators with a unique opportunity to implement very high capacity links with long hop length due to the channelling plan provided by ERC Recommendation 12-03.

As stated in the Report 152, the use of the 18 GHz band is regulated by the ERC Decision (00)07. This decision clearly indicates how to deploy FSS terminals and networks in the band.

ETNO would like to remind that the ERC Decision was the result of a long debate and, at that time, our members accepted it in a spirit of compromise, because they believed it would have given the opportunity of good deployment to both terrestrial and satellite communities.

The number of Administrations that have implemented it so far is really high (30 out of 48) - one of the best examples of harmonisation in Europe. This means that many European countries have been using for years the framework of that Decision to heavily deploy FS links for the mobile network infrastructure.

ETNO would therefore like to underline the risks that a perturbation of this environment would create.

## ETNO view

The conclusions of the ECC Report 152 related to the 18 GHz band state:

*“Taking account of the regulatory situation of the FS in this band, assess the use of the FS in this band in CEPT, including the frequency plans identified in Recommendation 12-03, with a view to identifying the feasibility of enhanced operations of uncoordinated FSS Earth stations in the band 17.7-19.7 GHz”*

On this issue the ECC has recently decided to review the ECC Report 003 (ECC Report 003: “Fixed Service in Europe. Current use and future trends Post-2002” - Lisbon, February 2002). This task is foreseen to be

completed in the months to come and will give the opportunity to see what the real FS situation is in the 18 GHz band and what the future trends are for it, with a view to the frequency plans adopted.

Other conclusions on the bands are *“In particular, study the feasibility of using gaps between the paired FS frequencies, taking into account channelling arrangements including those described in Recommendation 12-03”* and *“As a result, study whether a regime of exemption from individual licensing could be developed within appropriate sub-bands within this band (as identified, if any, from the above studies)”*

Concerning these future requirements, ETNO would like to underline that after the completion of the ECC Report 003 revision only, it will be possible to understand whether there's room for uncoordinated FSS terminals and, if so, the necessary compatibility studies to be conducted before any modification to the existing regulatory regime is taken into consideration.

As a consequence, ETNO strongly believes that any revision of the regulatory framework and in particular of the ERC Decision (00)07, that will constrain the radio relay network development in the 18 GHz band, should eventually be taken into account only after the completion of the ECC Report 003 revision and after detailed investigations on the compatibility issues.

## About ETNO

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.

To achieve in this goal, ETNO members have made very large investments in existing radio infrastructure to provide reliable high quality services to customers. Further investments are also planned to extend service coverage and capacity.

Provided the above scenario is followed, ETNO is confident that the conditions for such further investments will be improved and well preserved.