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ETNO Response to the RSPG consultation on “spectrum related aspects for next-generation wireless systems (5G)”

ETNO welcomes the RSPG opinion on the strategic roadmap towards 5G for Europe. The establishment of a strategic roadmap towards 5G should go beyond 2020, and should not only aim at facilitating the launch of 5G on a large scale by 2020, but also at enabling European industrial and societal transformation and economic growth from 2020 onwards.

ETNO believes that for 5G to succeed it is crucial to enable harmonized licensing of frequency bands below 6 GHz where a mobile ecosystem exists or could easily develop, but which are not yet licensed for mobile in all EU countries. For example the 700 MHz, 1400 MHz (including the extensions agreed at WRC-15), 2300 MHz, and 3400-3800 MHz frequency bands should be made available in as many Member States as possible by 2020, preferably on an exclusive basis.

In addition, a long-term spectrum strategy on enabling new frequency bands is needed. The possibility to enable spectrum for mobile both in several higher-frequency bands, and also in lower-frequency bands such as 470-694 MHz and 3800-4200 MHz should be explored. Sufficient amount of new spectrum has to be available by the 5G launch date in order to enable Europeans to be among the early adopters of 5G. To support various use cases of 5G, new spectrum in both high and low frequency is needed and a technology- and service-neutral approach will enable existing and new bands to support delivery of 5G services.

More specifically:

- ETNO agrees that the 3400-3800 MHz band is one of the primary bands suitable for the introduction of 5G use in Europe even before 2020. However, the expansion of this band up to 4.2 GHz for 5G purposes should be considered.
- ETNO agrees that 5G will need to be deployed also in bands already harmonised below 1 GHz, however, as well as in the 700MHz band mentioned in the opinion. The sub-700 MHz band should also play a key role in the 5G roadmap.
- While frequencies such as 3400-3800 MHz and 700 MHz may enable the early use cases of 5G services, they will not be able to target the ultimate double digit Gbit/s data rates of mature 5G systems that require access to higher bandwidths, even higher than what the abovementioned bands offer.
- ETNO agrees that all the technical and regulatory conditions for the bands already harmonized for mobile networks must fit for 5G use, as technology neutrality enables the most efficient use of existing bands within existing licenses. Thus, ETNO is of view that the least restrictive technical conditions should be reviewed and revised as required to fit for 5G use. However, these bands are heavily used for the provision of mobile broadband services and therefore not available for initial 5G deployments.

- ETNO would like to stress that, in addition to RSPG reviewing whether there is any requirement for European harmonisation measures in bands above 24 GHz before WRC-19, further spectrum needs and possibilities should be identified in order to be proposed as bands to be studied under the WRC-23 agenda. Additional lower and higher frequency bands will be needed over time and only some of these bands are currently addressed by the WRC-19. The frequency bands between 4GHz and 24GHz, not listed under WRC-19 agenda item 1.13, are also of interest for the mobile industry.

Further to the identification of appropriate spectrum bands for the deployment of 5G, ETNO believes that the duration of licenses, the deadlines for repurposing of the spectrum and the – non excessive – spectrum fees should be consistent between Member States. This would provide the necessary harmonization and predictability of spectrum policy across Member States that would encourage investments needed for 5G.

ETNO (European Telecommunications Network Operators' Association) represents Europe's telecommunications network operators and is the principal policy group for European e-communications network operators. ETNO's primary purpose is to promote a positive policy environment allowing the EU telecommunications sector to deliver best quality services to consumers and businesses.

For questions and clarifications regarding this position paper, please contact Francesco Versace, Director of Regulatory Affairs: versace@etno.eu