ETNO response to the RSPG Consultation on the draft Work Programme for 2022 and beyond

January 2022

The European Telecommunication Network Operators' Association (ETNO) welcomes the opportunity to provide feedback to the RSPG draft Work Programme for 2022 and beyond.

In general, we consider that the draft work programme is comprehensive and covers the key issues of interest. We encourage to have an active dialogue with stakeholders, and we positively acknowledge that the stakeholder involvement, e.g. in focused workshops, is noted in many work items. However, for the time being, it looks that such workshop is only planned for Mobile Technology Evolution work item. ETNO proposes that stakeholder workshops, or other forms of stakeholder involvement that are organized in addition to the public consultations, are planned for each work item in a timely manner to allow contributions to be taken into account when developing the final deliverables.

Furthermore, ETNO emphasizes the importance of spectrum in reaching the European Union Digital targets. The telecom industry is engaged to fulfil the 2025 Gigabit and 2030 Digital Compass objectives. However, we need RSPG to carefully consider in all its work how to reflect the targets in well-designed spectrum policy.

In order to support the targets and connectivity demands of society, it is important that sufficient spectrum availability is ensured also in future for public mobile networks with reasonable price and conditions. Otherwise, we risk staying far behind the targets. This is critical, as European mobile and fixed telecoms service revenue decreased by 18% over the decade between 2009 and 2019 while the level of investment sustained by telecom operators has remained stable. Communication services in the EU have suffered earlier and deeper price erosion than other global leaders such as the US, South Korea or Japan.

Additionally, prices and customer spending on digital communications services in Europe remain low (reflected by low ARPU) in comparison to these other regions[1]. A recent report has estimated that an additional €150bn of investment is needed for full 5G roll-out in the EU. This relates to costs of upgrading existing coverage networks to 5G, increasing densification of networks to offer higher capacity services, and providing enhanced capability services. In addition, a further €150bn is required to upgrade existing fixed infrastructure and roll out FTTH to provide gigabit speeds in Europe[2].

Peer review and Member States cooperation on authorisations and awards

The Peer Review process, as it has been run until now, is not transparent to the relevant stakeholders. Also, ETNO does not see that it has succeeded to address even the clear-cut problems in the award designs.

Mobile operators are the key stakeholders in the mobile spectrum awards and have a lot of experience on awards in all European countries, and thus could provide valuable inputs to this process. Mobile operators also typically have to address the consequences of badly designed awards, and still try to ensure mobile services with high quality for society demands. Thus, in all possible opportunities ETNO has called for a possibility for MNOs to attend and contribute to the peer review process.

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[1] https://etno.eu/component/attachments/attachments.html?task=download&id=7973
[2] https://www.etno.eu/component/attachments/attachments.html?task=download&id=8050

When it comes to the content of peer review work and ensuring best practises for awards, we note that recently there has been a lot of focus on 5G awards. While this continues to be important, we request RSPG to also ensure that best practices are shared and taken in use in license renewal processes.

Concerning the timing of a peer review of a specific award, it should be noted that any inputs to the award design, whether those come from peer Member States, the European Commission, or other stakeholders, would be most effective if received early in the award planning phase, e.g. in parallel or even before the first national consultation on the award. Regulators have better possibilities to take early inputs properly into account, without risking to delaying the award, and without "quick fixes" that might cause unexpected consequences in the award implementation.

We have sadly noted that, in some Member States, the political decision-making overdrives the expertise of spectrum authorities, and that changes in the political environment have largely impacted award processes and conditions and caused severe delays on making spectrum available. This creates an unpredictable environment for investment and should be avoided. We do not believe that peer review is an appropriate process to address this issue. Thus, more mandatory measures should be set, e.g. requirements on providing analysis and justified reasoning for award decision. This would help to prevent arbitrary decisions pending on current political environment.

WRC-23

As acknowledged by the European Commission, spectrum is critical to achieve the 2030 Digital targets. While ETNO supports the new EU-wide digital targets, it is important to ensure that the existing regulatory and policy framework is aligned with the connectivity targets.

Thus, ETNO would appreciate having a collaborative dialogue with RSPG on the preparation of EU positions for WRC-23.

The agenda items 1.2, 1.3, and 1.5 are the key interest for ETNO as they have the potential to address future spectrum demands in mid- and low bands, and to meet the increasing society demands for connectivity and capacity. A summary of ETNO views on these agenda items is detailed below.

- **Agenda Item 1.2**: ETNO supports identifying especially the spectrum band 6425-7125 MHz for IMT in WRC-23. From the listed spectrum bands in this agenda item, the spectrum range 6425-7125 MHz is the only realistic mid-band opportunity for Europe to satisfy the steadily increasing demand for 5G mobile broadband services and to support the objectives of the Digital Decade 2030. It also has potential for wider adoption globally. Even if in short term and/or in some countries or areas in Europe, it may be important to allow continuation of fixed links in this band, we believe this spectrum band provides great potential to address additional mid-band spectrum demands of mobile in future.
- **Agenda Item 1.3**: ETNO supports primary mobile allocation for 3600-3800 MHz. However, an upgrade to the primary mobile allocation should not create additional limitations for the current conditions for mobile/ IMT use within EU. Spectrum band 3400-3800 MHz is the key

"5G pioneer band" in EU. Part of that band, 3600-3800 MHz, has currently severe restrictions in a set of EU countries. Primary mobile allocation in Region 1 also for this part of the band may make the coordination situation clearer in countries that have borders with non-EU countries.

- **Agenda Item 1.5**: ETNO supports primary mobile allocation in 470-694 MHz. In addition, IMT identification should be considered. Demand for higher speed broadband is increasing also in rural areas and transport paths, not least because of streamed and on-demand media services in mobile networks, but also because of new applications, such as the introduction of automatic driving. Additional low-band spectrum is essential for being able to address this demand with reasonable costs, and to achieve a more balanced situation between urban and rural broadband connectivity and to address the digital divide.

"Good offices" to assist in bilateral negotiations between Member States

ETNO appreciates the RSPG's efforts to support cross-border coordination, as well as monitoring of coordination situation of harmonized mobile bands, within EU, and in non-EU borders.

Mobile technology evolution – experiences and strategies

ETNO supports technology neutrality. Mobile operators migrate to the new and more efficient technologies when feasible based on commercial demands. Many operators have already published plans for 2G and 3G switch-off. Legacy services can be served also with new technologies, but this may require equipment changes.

This work item should only focus on the possible implications on the migration and ensuring that any new applications introduced in EU are technology neutral. Similar examples as eCall, relying on legacy technology already when introduced, should be prevented. This work item should not set dedicated timelines for migration or encourage for national or EU-level obligations to support legacy mobile technologies longer than commercially reasonable.

ETNO appreciates that the stakeholder workshop is already added in the time schedule of this activity.

Digital Decade 2030

ETNO notes that, even if the European Commission has acknowledged that spectrum is critical to achieve the Digital Targets 2030, it is still unclear whether more specific spectrum policy programme is being planned. ETNO is of the view that strategic orientations on spectrum management and actions that allow for more consulted, regular and long term planning of the spectrum management, e.g. in form of updated Radio Spectrum Policy Programme (RSPP), would improve the predictability and support for investments in Telecom sector. ETNO is willing to provide inputs to potential RSPG initiatives on this.

As highlighted in the very beginning of this reply, spectrum is critical in reaching the Digital Targets. Thus, ETNO requests RSPG to carefully consider the targets in all its work, and how to reflect them in well-designed spectrum policy.

The development of 6G and possible implications for spectrum needs and guidance on the rollout of future wireless broadband networks

ETNO supports plans to start early considerations of 6G. In particular, ETNO appreciates that RSPG notes the pivotal role of wireless broadband and plans to consider early signals of additional spectrum demands, and the necessity to make a certain amount of harmonised spectrum available in a timely manner – including bands targeted for 5G, including low and mid bands. It is important to involve stakeholders in this work.

ETNO recognizes that RSPG has highlighted the importance of additional spectrum for verticals and local networks, e.g. in its Opinion on Additional spectrum needs and guidance on the fast rollout of future wireless broadband networks (16 June 2021). We still fail to understand and agree that, for example, 400 MHz of extremely valuable spectrum in 3.8-4.2 GHz will be efficiently used if only allocated for vertical and local networks. We request RSPG to consider and provide justification on how these networks will contribute to European digital targets, noting that typically vertical and local networks serve only very dedicated purpose, while obligations to serve whole society are set to nationwide operators. It is very important to ensure that valuable spectrum is not fragmented for dedicated uses in a way that demands of whole society cannot be met in future.

Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU

ETNO agrees and supports the proposal to start an EU-specific strategy work on future use of 470-694 MHz, that is parallel to WRC-23 activity.

There is ongoing change in media content viewing habits, and both commercial and public broadcasters provide more and more content in their streaming and on-demand platforms. This change has tremendously increased media content data traffic in broadband networks, and will continue to do so. In addition, technical developments are expected to provide better support of broadcast- and multicast-modes in mobile networks.

We recognize that there are great differences within EU on importance of DTT-platform for linear-TV distribution. While in some countries the use ratio of DTT-platform is low, and some have even switched-off DTT network already, in some countries it remains as an important linear-TV viewing platform. Considering this situation, and the developments in media content viewing habits and technology, Europe should actively and openly look for solutions to ensure both efficient spectrum use, and efficient media content distribution based on society demands.

The work programme notes that, even if WRC-23 decides a co-primary mobile allocation, it does not create any obligation to the EU to change the current harmonized use of the band. While ETNO agrees

with this, we strongly believe that a co-primary allocation is the pre-requisite towards development of technical solutions that would best fit for European situation. It provides Europe with the required flexibility to openly decide on the most beneficial socio-economic, spectrum efficient but also technological scenario.

Role of Radio Spectrum Policy to help combat Climate Change

ETNO continues to support the RSPG's focus on sustainability and climate change as a key important horizontal principle and high-level priority, and is willing to provide further inputs to this work. As stated in ETNO responses to previous RSPG consultations on the topic[3], in general ETNO believes that efficient spectrum policy and managements also supports climate goals.

With sufficient spectrum resources available and by avoiding unnecessary deployment and operation limitations and requirements, spectrum regulators can support to reduce climate impacts.

The current engagement towards the twin green and digital transitions, and a shift to an investment friendly attitude, would support operators to continue investing in sustainable networks and services. On the other hand, too stringent environmental regulation might trigger higher cost of deployment and negatively affect end-user prices or connectivity and related services coverage, thus weakening the "enablement effect" of the telco sector.

Telecom networks are indeed not only making substantial progresses on sustainability and circular economy targets in their own operation, but they are the backbones of major CO_2 reductions enabled by digitalization, across different sectors of the economy and society. Services based on the Internet of Things (IoT), Cloud or Big Data require a strong digital infrastructure and enable more efficient use of resources across many sectors such as: manufacturing, agriculture, mobility, transport/logistics, energy, healthcare, education, public administration. The recent BCG study prepared for ETNO, measures that this enabling potential can go up to - 15% of the global CO_2 emissions[4].

Finally, ETNO would like to express its willingness to contribute to the debate and support RSPG's activity on climate change and we are ready to engage in the debate and provide with our expertise.

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[3] ETNO comments to the Draft RSPG Opinion on the role of radio spectrum policy to help combat climate change available here and ETNO comments to Questionnaire of the Sub-group on Role of RSP to Help Combat Climate Change available here
[4] BCG study for ETNO, 2021 "Connectivity and Beyond: How Telcos Can Accelerate a Digital Future For All" available here

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.

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