

DIGITALEUROPE response to the consultation on the Draft RSPG Opinion on the Review of the RSPP

Brussels, 18 December 2015

DIGITALEUROPE would like to thank the RSPG for the opportunity to comment on its draft opinion on the implementation of the current RSPP and its revision to address the next period.

1. Flexibility in the UHF band

DIGITALEUROPE agrees with RSPG on its assessment of the opportunities for white space device in the TV spectrum presented in section 4.3.1.1. White Space attractiveness may be limited if access is opportunistic and uncertain. The licencing and general regulatory regime applicable to any solution operating in the UHF white spaces will impact coexistence and usability and has therefore to be taken into account when assessing alleged benefits of a technology. DIGITALEUROPE proposes studying supplemental downlink to address white spaces in the lower UHF range.

There is a need for flexibility in the 470-694 MHz band, as highlighted by the RSPG itself in its opinion on a long-term strategy on the future use of the UHF band (470-790 MHz) in the European Union:

The approach the RSPG has chosen is one of flexibility and certainty. Certainty should be provided for those Member States using this band for broadcasting. On the other hand flexibility could be afforded to Member States to introduce different services in the band 470-694 MHz, if compatible with broadcasting needs in the relevant Member State, while ensuring no constraint to other Member States using this band for broadcasting in order to maintain the potential cross-border coordination problems to a minimum.

This option was also supported by the Lamy Report on results of the work of the high level group on the future use of the UHF band (470-790 MHz), which stated:

In this regard, my recommendation to the Commission for the "flexibility option" is to study EU-harmonized scenarios allowing co-existence of traditional broadcasting services in the 470-694 MHz band with other downlink-only (i.e. unidirectional) electronic communications services, in cases where there is no or declining demand for DTT at national level. Such scenarios should guarantee continued access to spectrum for terrestrial broadcasting as the primary user, subject to national demand. This calls for timely study, adoption and dissemination of an EU harmonized approach to supplemental downlink and its co-existence with terrestrial broadcasting services in order to preserve the specificities of the European audiovisual model and at the same time open the door to innovation and new services.

Following the WRC-15, now that clarity has been achieved for the utilization of the 470-694 MHz band in the period until at least 2023, it is time to open studies on the practical introduction of flexibility in the band. Such studies may include regulatory, technical and economic considerations. Such studies can trigger positive collaboration between mobile and broadcast sectors and pave the way to practical experiments which are required to identify win-win convergence scenarios for both sectors. The utilization of the band will be reviewed at global level during WRC-23, at which stage Europe needs to have a fully developed strategy for the long term evolution of the band.

DIGITALEUROPE urges RSPG to include the introduction of flexibility in the 470-694 MHz band as part of the RSPP for the next period.

DIGITALEUROPE has released several reports on the flexibility option, demonstrating its commitment and readiness to contribute to future studies:

1. [Flexibility in UHF: Regulatory Options](#) (October 2015)
2. [DIGITALEUROPE White paper on supplemental downlink in the UHF band](#) (December 2014)
3. [DIGITALEUROPE Vision on the long-term future of the UHF spectrum](#) (September 2014)

2. How to address 5G challenges

DIGITALEUROPE would like to provide the following comments on section 4.3.2.4 – How to address 5G challenges. DIGITALEUROPE has already published a White Paper on 5G spectrum (Aug 2015) and has published further recommendations for spectrum above 6 GHz (October 2015). The white paper provides a great deal of background on the emerging 5G scenarios and requirements and DIGITALEUROPE proposed the following recommendations that continue to remain relevant:

- Including the consideration of new spectrum bands below and above 6GHz for 5G in the second phase of the Radio Spectrum Policy Programme (RSPP).
- Developing a detailed investigation of spectrum within CEPT for spectrum above 6GHz covering all the existing Radio Services, their use and future needs and trends, in order to better understand the spectrum opportunities for 5G systems.
- Supporting harmonization of spectrum allocations, in order to enable economy-of-scale advantages for development of 5G systems.
- Making available spectrum for 5G deployment by 2020.
- Supporting studies in a range of high frequency bands for potential IMT identification that can satisfy the diverse range of 5G applications and usage scenarios. Spectrum bands in ranges below 20GHz, between 20 and 30GHz, between 30 and 45GHz and above 45GHz should be considered.
- Supporting studies in frequency ranges that are both relevant to the research and development activities that can be deployed across Europe in a timely fashion to support the aims of the Digital Agenda in the Europe 2020 strategy.

Already WRC-15 has identified an agenda item for WRC-19 (AI 1.13) that will identify new higher frequency bands for 5G mobile broadband.

Therefore the RSPG recommendation to prepare Europe for new spectrum for 5G above 6GHz will become urgent and is fully supported by DIGITALEUROPE. In addition DIGITALEUROPE fully supports the development of a second RSPP phase that takes the recommendations above into account to drive forward the developments.

DIGITALEUROPE continues to recommend that studies in a range of frequency bands are needed to satisfy the diverse range of 5G applications and usage scenarios. Spectrum bands in ranges below 20 GHz will be important as well as those between 20 and 30 GHz, between 30 and 45 GHz and above 45 GHz that are already well represented in the WRC-19 proposals.

For further information on DIGITALEUROPE’s position on 5G Spectrum:

1. [DIGITALEUROPE vision on spectrum needs for 5G](#) (October 2014)
2. [DIGITALEUROPE White Paper on 5G](#) (August 2015)

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ABOUT DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies.

DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 59 corporate members and 35 national trade associations from across Europe. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

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