12 JANUARY 2022

Response to public consultation on draft RSPG Work Programme for 2022 and beyond

Introduction

DIGITALEUROPE welcomes the opportunity to comment on the proposed Radio Spectrum Policy Group (RSPG) final draft Work Programme for 2022 and beyond and applauds the RSPG for the continuous excellence and relevance of its actions based on the twin transition with the European Green Deal and the European Digital Decade.

The Opinions of the RSPG have set, thanks to their strategic long-term vision, the basis of spectrum usage harmonisation in Europe. DIGITALEUROPE looks forward to the RSPG's future work in shaping EU spectrum policy in its enhanced role under the new regulatory framework.

Furthermore, we wish to commend the RSPG for the fruitful cooperation between industry and regulators, allowing for a better understanding of the challenges and constraints facing the sector. We encourage the RSPG to continue and intensify exchanges with stakeholders through regular workshops, in addition to the usual public consultations and reports.

DIGITALEUROPE supports the proposed Work Programme for 2022 and beyond, and encourages the RSPG to consider Wi-Fi in addition to 5G as playing an important role in providing wireless broadband connectivity.

Table of contents

Peer review and Member State cooperation on authorisations and awards

As per Art. 35 EECC, the peer review process aims to facilitate collaboration and expertise sharing between Member States on the spectrum awards and authorisation process. Our understanding is that the process will be entirely closed to industry, and we would like to emphasise the importance of transparency. We encourage the RSPG to continue to organise stakeholder workshops on awards, and to publish annual reports on experiences and best practices concerning awards.

WRC-23

In view of the next WRC-23, the RSPG should finalise its recommendations for EU positions on items that are of importance for EU policies.

Good offices to assist in bilateral negotiations between Member States

Cross-border coordination influences the release of spectrum in some areas for new services, and therefore the rollout of mobile broadband for all European consumers. This initiative will remain crucial as 5G frequency bands are opened across Europe.

We acknowledge the role the RSPG plays in this field, as well as in the monitoring of coordination of harmonised spectrum bands, both within the EU and with non-EU countries.

Mobile technology evolution – experiences and strategies

DIGITALEUROPE is a proponent of the technology neutrality principle and supports efficient spectrum use enabled by the newest and more efficient technologies when/where feasible. We note that several operators in Europe already announced the planned switch-off of 2G and 3G networks.

One aspect that the RSPG could consider is the migration of legacy services and its potential implications, as well as assuring that new EU-wide applications will be technology neutral.

We welcome the RSPG's initiative to organise stakeholder workshops on this topic.

Digital Decade

Ubiquitous deployments of both wired and wireless communications are essential to helping Europe achieve its Digital Decade vision, as well to enabling the EU's sustainable development goals.

It is important to consider both 5G and Wi-Fi as playing an important role in providing wireless broadband connectivity.

Spectrum that supports the future ongoing growth of 5G and Wi-Fi is essential.

Development of 6G, possible implications for spectrum needs, and guidance on rollout of future wireless broadband networks

DIGITALEUROPE encourages the RSPG in conducting an evaluation of 5G in Europe in order to identify aspects that could be better addressed in the 6G era, including in the wireless spectrum domain, and the role of spectrum in the different ranges (from the low bands to the sub-THz range) in achieving the desired outcomes.

It is important from a competitiveness perspective for Europe to take a global leadership role in 6G research, standardisation and development, targeting around the year 2030 for commercial deployments. We support the RSPG actions in this respect.

We encourage the RSPG to engage in workshops with industry, including verticals, for a better cooperation with a view to launching 6G successfully for both consumers and businesses.

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

It is important for the RSPG to anticipate reflections on the future of the UHF band, in particular setting out the major elements of a strategic EU policy for the UHF band that can ensure a sustainable win-win situation for the sectors concerned. Such sustainable policy will also benefit consumers, promote the single market, and strengthen the EU's role in global developments.

Role of radio spectrum policy in helping combat climate change

DIGITALEUROPE supports the RSPG's focus on sustainability and climate change as a key important horizontal principle and high-level priority. We believe that efficient spectrum policy and management also support climate goals.

Current discussions are mainly addressing the energy efficiency of wireless technologies, and DIGITALEUROPE members are working to improve equipment to reduce energy consumption. This being said, too stringent environmental regulation may trigger delays in deployment, supplemental densification of networks and overall higher cost of network rollout.

While discussions on spectrum-related matters are at the initial stages, spectrum regulators can work to support reducing climate impacts by making available sufficient contiguous harmonised spectrum per network, as opposed to aggregating smaller non-contiguous spectrum.

FOR MORE INFORMATION, PLEASE CONTACT:

Alberto Di Felice

Director for Infrastructure, Privacy & Security Policy

alberto.difelice@digitaleurope.org / +32 471 99 34 25

Zoey Stambolliu

Manager for Infrastructure & Security Policy

zoey.stambolliu@digitaleurope.org / +32 498 88 63 05

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 Membership

Corporate Members

Accenture, Airbus, Amazon, AMD, Apple, Arçelik, Assent, Atos, Autodesk, Bayer, Bidao, Bosch, Bose, Bristol-Myers Squibb, Brother, Canon, Cisco, DATEV, Dell, Dropbox, Eli Lilly and Company, Epson, Ericsson, ESET, EY, Facebook, Fujitsu, GlaxoSmithKline, Global Knowledge, Google, Graphcore, Hewlett Packard Enterprise, Hitachi, HP Inc., HSBC, Huawei, Intel, Johnson & Johnson, Johnson Controls International, JVC Kenwood Group, Konica Minolta, Kyocera, Lenovo, Lexmark, LG Electronics, Mastercard, Microsoft, Mitsubishi Electric Europe, Motorola Solutions, MSD Europe Inc., NEC, Nemetschek, NetApp, Nokia, Nvidia Ltd., Oki, OPPO, Oracle, Palo Alto Networks, Panasonic Europe, Philips, Pioneer, Qualcomm, Red Hat, ResMed, Ricoh, Roche, Rockwell Automation, Samsung, SAP, SAS, Schneider Electric, Sharp Electronics, Siemens, Siemens Healthineers, Sky CP, Sony, Sopra Steria, Swatch Group, Technicolor, Texas Instruments, TikTok, Toshiba, TP Vision, UnitedHealth Group, Visa, Vivo, VMware, Waymo, Workday, Xerox, Xiaomi, Zoom.

National Trade Associations

Austria: IOÖ
Belarus: INFOPARK
Belgium: AGORIA
Croatia: Croatian Chamber of Economy
Cyprus: CITEA
Denmark: DI Digital, IT BRANCHEN, Dansk Erhverv
Estonia: ITL
Finland: TIF
France: AFNUM, SECIMAVI, numeum

Germany: bitkom, ZVEI
Greece: SEPE
Hungary: IVSZ
Ireland: Technology Ireland
Italy: Anitec-Assinform
Lithuania: INFOBALT
Luxembourg: APSI
Moldova: ATIC
Netherlands: NLdigital, FIAR
Norway: Abelia
Poland: KIGEIT, PIIT, ZIPSEE
Portugal: AGEFE

Romania: ANIS
Slovakia: ITAS
Slovenia: ICT Association of Slovenia at CCIS
Spain: AMETIC
Sweden: TechSverige, Teknikföretagen
Switzerland: SWICO
Turkey: Digital Turkey Platform, ECID
United Kingdom: techUK