# DIGITALEUROPE views on draft RSPG Opinion on a Radio Spectrum Policy Programme

## Introduction

A new, forward-looking spectrum policy is crucial for Europe to respond with agility to the unprecedented societal and economic challenges presented by the COVID-19 crisis. DIGITALEUROPE therefore welcomes the Radio Spectrum Policy Group's (RSPG) initiative to revise the Radio Spectrum Policy Programme (RSPP).[1]

We invite the RSPP to consider the following points in its final Opinion:

▸▸ The importance of adopting key strategic spectrum objectives;

▸▸ What spectrum needs can support the EU's vision and policies; and

▸▸ Our proposal for early RSPP objectives for the next five years.

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[1] *Draft RSPG Opinion on a Radio Spectrum Policy Programme (RSPP)*, available at https://rspg-spectrum.eu/wp-content/uploads/2021/02/RSPG21-014final_Draft_RSPG_Opinion_on_RSPP.pdf.

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# Strategic spectrum issues

DIGITALEUROPE believes that spectrum policy should support a range of technology solutions designed for citizens and businesses.

We agree that there is no one-size-fits-all solution. What is required is an overall spectrum approach supporting a mix of technologies in combination with appropriate regulatory solutions. Licence-exemption, local licences, national licences and spectrum sharing all contribute significantly to the digital transition. EU spectrum policy makers should maintain a proper balance between these authorisation models.

The final revised RSPP should adopt the following key strategic spectrum objectives:

▶▶ Ensuring a timely, appropriate and balanced approach enabling access to additional licensed and licence-exempt spectrum to serve businesses and consumers, while working towards greater efficiency and intensity of use in existing and new bands;

▶▶ Encouraging harmonisation and facilitating larger ecosystems through the development of band plans, associated technical rules and authorisation schemes that incentivise investment and innovation; and

▶▶ Investigating regulatory measures that can improve spectrum efficiency.

# Spectrum needs supporting EU policies

The RSPP should support Europe's digital and green transition, and strengthen Europe's industrial ambitions. Ensuring spectrum availability is crucial in bolstering European policy initiatives as detailed most recently in the 2030 Digital Compass,[2] as well as Europe's transport, audiovisual and media policies.

We stress that different frequency ranges support different deployment models, technologies and objectives. We therefore do not share the RSPP's view that spectrum availability can be simply assessed by the overall quantity of spectrum available for innovative wireless services, and that there is 'no need to define any quantitative target.'[3]

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[2] COM(2021) 118 final.

[3] See p. 5 of the draft Opinion.

On the contrary, we urge that the final Opinion should include a requirement to identify spectrum needs for licensed and licence-exempt spectrum in each of the relevant frequency ranges – low, mid- and high bands.

For 2025, spectrum needs should be assessed to enable the following target data rates:

▶▶ For IMT2020 in the context of city-wide high-capacity coverage, a minimum of 100 Mbps downlink and 50 Mbps uplink (IMT2020 requirement) for all active users;

▶▶ For private Wi-Fi, data rates should be consistent with the data rates provided to the Wi-Fi access point by the public very high-capacity network (VHCN), in particular considering the 2025 European goals:

  ▪ 100 Mbps networks reaching all European households by 2025, with the possibility to upgrade those networks to reach much higher speeds; and

  ▪ Gigabit connectivity (a minimum of 1000 Mbps downlink and 200 Mbps uplink)[4] connecting all main socio-economic drivers.

▶▶ For public WLAN (Wi-Fi) in the context of VHCNs, a minimum of 150 Mbps downlink and 50 Mbps uplink;[5] and

▶▶ For fixed wireless access (FWA) in the context of VHCNs, a minimum of 150 Mbps downlink and 50 Mbps uplink, or a minimum of 1000 Mbps downlink and 200 Mbps uplink.[6]

As these targets are limited to the 2025 timeframe, they should be complemented by more ambitious targets over the course of the RSPP, which should include clear objectives to:

▶▶ Support future target requirements for IMT beyond 2020 and for the next generations of Wi-Fi;

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[4] Criterion 3, *BEREC Guidelines on Very High Capacity Networks*, available at https://berec.europa.eu/eng/document_register/subject_matter/berec/regulatory_best_practices/guidelines/9439-berec-guidelines-on-very-high-capacity-networks.

[5] Criterion 4, *BEREC Guidelines on Very High Capacity Networks*.

[6] Criteria 3 and 4, *BEREC Guidelines on Very High Capacity Networks*. DIGITALEUROPE believes that FWA could help Europe fulfil its 2025 target to have every household connected to 100 Mbps, and could also play a role for the proposed 2030 target to have all households covered by a gigabit network.

▶▶ Support the proposed EU 2030 target to have all European households covered by a gigabit network, with all populated areas covered by 5G;[7]

▶▶ Support the European Green Deal,[8] the New Industrial Strategy for Europe[9] and the Digital Education Action Plan;[10] and

▶▶ Identify, harmonise and make available the spectrum bands required to fulfil these objectives by 2030, including through early identification of EU objectives for WRC-27 identifying target bands for the evolution of next-generation mobile and wireless access systems (such as IMT beyond 2020 and Wi-Fi).

# Early RSPP objectives for the next five years

Furthermore, DIGITALEUROPE proposes for the RSPP to include the following concrete objectives for immediate implementation in the next five years:

▶▶ Encouraging innovative services in the UHF band (470-694 MHz), combining the strength of the EU's audiovisual and telecommunications sectors. Such innovative services could also support other key EU sectors such as automotive;

▶▶ Initiating sharing studies within CEPT on possibilities for nationwide and local MFCN at 3.8-4.2 GHz. This will be an important building block in enabling future policy discussions on potentially making the 3.8-4.2 GHz range available in the medium term;

▶▶ Identifying a sufficiently harmonised spectrum solution for the industrial digital transition to ensure ecosystem availability for nationwide and local licensing. Considering the spectrum needs for this transition and the potential for additional spectrum availability at 3.8-4.2 GHz as well as in mmWave spectrum;

▶▶ Assessing options for the upper 6 GHz (6425-7125 MHz) band in the five-year horizon, taking into account mid-band spectrum needs for licensed and licence-exempt applications and services and the potential for regional and global harmonisation of this band; and

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[7] COM(2021) 118 final.

[8] COM(2019) 640 final.

[9] COM(2020) 102 final.

[10] COM(2020) 624 final.

▸▸ Incentivising, encouraging and maximising the use of harmonised mmWave bands.

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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.

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