



Telefónica Group response to consultation on draft RSPG Opinion on Common Policy Objectives for WRC-15

General comments

Telefónica would like to thank the Radio Spectrum Policy Group (RSPG) for giving stakeholders the opportunity to comment on their draft Opinion on Common Policy Objectives for the 2015 World Radiocommunication Conference (WRC-15). In terms of the general preparatory process, we acknowledge that it is important to identify, in consultation with stakeholders, the policy objectives and associated priorities for Europe prior to the Conference Preparatory Meeting (CPM), and as the CEPT adopts European Common Proposals (ECPs) and their associated briefing documentation.

Telefónica agrees with the RSPG that the EU policies of most relevance to WRC-15 are those relating to the Information Society (Electronic Communications), Space, Transport, and the Scientific use of spectrum. The Agenda items of direct interest to Telefónica include AI1.1, 1.2, 1.3, and 9.1, where it relates to the Information Society and Electronic Communications. In addition, the Agenda of Future Conferences is also of high importance to us and we are pleased that the RSPG includes a specific recommendation under AI10 with regard to the spectrum needs for the fifth generation of mobile networks (commonly known as 5G or, in ITU terms, IMT-2020).

Electronic Communications

In particular, we highlight the importance of Agenda Item 1.2, which has a direct bearing on the use of spectrum in the 700MHz band to provide electronic communications services other than broadcasting. This has been the subject of significant European study in recent months and years following the allocation at WRC-12, which becomes effective immediately after WRC-15. Telefónica notes that the RSPG recommends that Member States should:

- support 694MHz as the lower edge for the allocation to the mobile service on a co-primary basis with the broadcasting service and identification for IMT in the 700MHz band, while ensuring protection of the broadcasting service below 694MHz; and
- ensure that no regulatory provisions in the Radio Regulations (RR) relevant to coexistence with broadcasting (co-channel, co-frequency and adjacent frequency) in addition to GE-06 agreement are adopted.

Telefónica supports wholeheartedly these proposals.

In addition, the RSPG recommends that Member States should ensure equitable access between mobile service and Aeronautical RadioNavigation Services (ARNS), so as to facilitate the deployment of mobile services in all EU countries through appropriate regulatory provisions in the RR, and that cross-border coordination agreements should

be reached before WRC-15 for all countries bordering countries outside the EU operating ARNS. **We support this action on cross-border coordination.**

With regard to Agenda Item 1.1, the RSPG highlights that AI1.1 is “one of the most significant WRC issues for many years”, and recommends that European Member States “should ensure that at WRC-15 additional spectrum is identified for IMT and allocated to mobile services as appropriate”. **Telefónica fully supports this recommendation, but we are concerned that the proposed positions do not underpin the significant nature of the issue, in that the amount of spectrum Member States are seeking to identify will be short of the amount of spectrum required over the next few years.**

In particular, the RSPG proposes to recommend that Member States should support the harmonisation of existing allocations for electronic communication services in EU Member states on a global level to gain benefits from economies of scale and increased opportunities. **We support this recommendation and the corollary – that where opportunities exist to align with allocations in other world regions, as we are doing with the 700MHz band, Europe should take these too.**

The RSPG also proposes that Europe should not support a mobile allocation in the band 470–694MHz. As Telefónica has noted in our response to the RSPG consultation on the UHF Band, the RSPG is in our view unjustifiably pessimistic with respect to the role that platforms different from DTT could play in the preservation of the cultural and social values that Europe wants to protect. A wide range of hybrid options are possible in which DTT can be used in combination with alternative delivery platforms to fulfil social and cultural needs, reducing the number of DTT channels required, and as a consequence also diminishing the amount of spectrum set aside for DTT use. The need for spectrum specifically reserved for DTT could also be reduced through technological innovation in broadcasting. Ten years is a very long time horizon in fast developing industries, so we believe more flexible options should be explored in depth, both at EU and national level, before committing to a specific long lasting spectrum allocation that would significantly limit the way in which the various options could be implemented.

We recognise that in the majority of our European footprint, we have strong DTT platforms and that there is a political reality that in the medium term these will continue to exist, but we believe there will be increasing scope to reduce the number of channels carried via DTT. Telefónica does not see that a co-primary allocation to the Mobile Service will necessarily lead to the exit of DTT from these frequencies in the medium term, as the future of DTT in this band would still rest with EU policymakers. We are very pleased that the RSPG expresses the view in the draft Opinion that Member States should have the flexibility to use the 470-694MHz band for WBB downlink. In the context of the ITU Radio Regulations, however, such flexible use would likely be in conflict with an exclusive primary allocation of the 470-694MHz band to the Broadcasting Service. Since the band is not yet allocated to the Mobile Service, and considering that a WBB downlink use would most likely fall into this ITU Service category, the desired flexibility would not be possible under the existing ITU regulatory framework.

In order to facilitate the flexibility desired, and to achieve the harmonisation of allocations on a global level indicated above, **Telefónica believes that it would be appropriate to introduce a co-primary allocation at WRC-15 to spectrum**

below 694MHz. Whilst an FDD allocation below 694MHz would be welcome, we can also see value in any IMT solution being restricted to downlink-only operation of WBB to emphasise the required coexistence with a continued use of the band by DTT, as recommended in the draft RSPG Opinion on the UHF band.

Following on from the earlier RSPG Opinion on Wireless Broadband, the RSPG proposes to recommend support for the worldwide identification of additional frequency bands for IMT around 1.5GHz, and in particular 1427-1452MHz, 1452-1492MHz, and 1492-1518MHz; and support for no additional regulatory constraints to the Mobile Service for the protection of aeronautical telemetry in the band 1429–1518MHz. **Telefónica fully supports this recommendation.** We would also encourage the RSPG, European Commission and Member States to begin the process of enabling the full band to be assigned at the earliest possible date by revising and extending the imminent EU Decision relating to the 1452-1492MHz sub-band¹.

In addition, noting that these bands are already harmonised in the EU, the RSPG proposes to recommend support for the worldwide identification of the 3.4-3.6GHz and 3.6-3.8GHz bands. **We support this recommendation, including modification of the Mobile Service status to co-primary in the RR.** Telefónica would also like to see the RSPG confirm in its final Opinion on WRC-15 that, under AI9.1.5 (Resolution 154 (WRC-12)), these bands should not be subject to any additional regulatory constraints to the Mobile Service, as this issue is adequately addressed in Decision 2008/411/EC as amended by 2014/276/EU² and FN5.430A, which should only be modified as a consequence of a decision to change the allocation status of the Mobile Service to co-primary in both sub-bands. This Agenda Item is currently superficially addressed under Space Policy in the draft Opinion on WRC-15.

Taking into account the overall recommendation that identifying additional spectrum for IMT is one of the most significant WRC issues for many years, we note with concern that most of the frequency bands mentioned in the draft RSPG Opinion are either already available for WBB or are currently being harmonised within the EU. This is the case for the 1452-1492MHz band and the 3.4-3.8GHz band. Other bands mentioned in the draft RSPG Opinion (700MHz and 2300MHz) have already been addressed by previous WRCs and are thus not considered in the context of WRC-15 AI1.1 and identifying additional IMT spectrum. The consequence of this is that the current draft RSPG Opinion supports a mere 51MHz as additional spectrum for WBB at WRC-15.

To address this issue, other candidate frequency bands should also be considered within the RSPG Opinion on WRC-15. Besides the 470-694MHz band (see above) and the 3.8-4.2GHz band, a very relevant candidate band in the context of AI1.1 is the 2.7-2.9GHz band. This band is currently being used mostly for ATC radars, however many Member States only operate a few radars at dedicated locations around airports that only use a portion of the band, thus allowing geographic and/or frequency sharing. Furthermore, a number of Member States have already expressed in CEPT discussions that they are considering (part of) the 2.7-2.9GHz band for WBB.

¹ RSCOM 14-52 "Draft Commission Implementing Decision on the harmonisation of the 1452-1492 MHz frequency band for terrestrial systems capable of providing electronic communications services in the Community".

² 2014/276/EU Article 2.3: Member States shall not be bound to implement the obligations under this Decision in geographical areas where coordination with third countries requires a deviation from the parameters in the Annex. Member States shall make all practicable efforts to solve such deviations, which they shall notify to the Commission, including the affected geographical areas, and publish the relevant information pursuant to Decision No 676/2002/EC.

Telefónica therefore suggests that the RSPG Opinion also considers the 2.7-2.9GHz band under WRC-15 AI1.1.

Under Agenda Item 1.3, the RSPG proposes to recommend that Member States should support a revision of WRC-Resolution 646 providing relevant information on regional PPDR frequency ranges with no obligation on the use of specific technology and specific frequency band. **Telefónica fully supports this recommendation** and would further like to suggest that this also applies to the type of PPDR network to be used (dedicated, commercial or hybrid).

Future Conference Agenda

Finally, regarding the future Conference Agenda (Agenda Item 10), Telefónica agrees that it is important to identify, as soon as possible, opportunities to promote European policies through action at future WRCs with the objective to promote European arrangements at a global level. **We reiterate our support** for the RSPG proposal to recommend support for a future Agenda Item addressing the spectrum needs for the fifth generation of mobile networks, with a focus above 6GHz. A number of relevant EU research projects are already under way³, and we expect more will follow under the Horizon 2020 work programme, where technologies and system concepts that allow use of mm-wave frequencies for access and backhaul, and mm-wave specific channel properties, will be explored.

³ Including METIS, to which Telefónica has been contributing actively.