



UMTS Forum views on EC Consultation on the 2.6 GHz IMT-2000/UMTS Extension Band

The UMTS Forum reaffirms its position in favour of the harmonisation of the band 2500-2690 MHz for IMT-2000/UMTS.

The UMTS Forum fully supports decision ECC/DEC(05)05 adopted in March 2005 since it clearly designates and harmonises the whole band 2500-2690 MHz for IMT-2000/UMTS and thus improves economies of scale, pan-European operations, interoperability and possibilities for global roaming. The UMTS Forum agrees with the RSC that the CEPT has fulfilled its mandate through the adoption of ECC/DEC(05)05. CEPT/ECC Decision was prepared in a correct way involving all interested parties in Europe. It is a clear and comprehensive Decision and is the most advantageous decision achievable for Europe regarding the use of the 2.6GHz band. It is the result of extensive discussions throughout Europe and provides sufficient regulatory clarity for European industry.

Regarding the requests for more flexibility, the Forum's view is that sufficient flexibility is provided with the ECC interpretation of the term 'designated'. The Decision ECC/DEC/(05)05 does not preclude the implementation of other technologies by Administrations with such a national market need. It does however provide an appropriate tool for those Administrations that prefer the ITU-R harmonised approach for IMT-2000 technologies. The ECC Decision is a tool to improve harmonisation and this objective should not be watered down.

The UMTS Forum finds very misleading the Commission qualification for IMT-2000 as exclusive since IMT-2000 is not a single technology specific term. The UMTS Forum prefers to see the reference to the IMT-2000 family rather than to IMT-2000 "only". The Forum wants to highlight that the IMT-2000 family concept, containing five open mobile standards, already includes a high level of flexibility that was derived from a long and international consensus building process with the active participation and contribution of Administrations, operators and manufacturers from all World regions.

The inclusion of technologies into the IMT-2000 family is an open and transparent international process in ITU-R WP8F and is also available to new qualified technologies.

In the context of this consultation, the Forum's understanding of the Commission wording "technically compatible technologies" is technologies that are expected to be able to operate in frequency blocks adjacent to IMT-2000 blocks without producing more interference or requesting more protection than IMT-2000. The Forum considers that "technically compatible technologies" does not imply interoperability with IMT-2000 networks nor certain underlay technologies such as UWB.

Justify and Quantify:	IMT-2000 and technically compatible technologies	IMT-2000 family
<p>What is the impact on competition in the internal market?</p>	<p>This option will cause the fragmentation and uncertainty of the internal market. Fragmentation will limit the competition. Geographical coverage and users' possibilities to change operator would be constrained. New equipment would need to be bought and a new user interface have to be adopted.</p> <p>Competition is limited to the fight between non-interoperable standards to conquer exclusive market shares.</p>	<p>The current European mobile market based on GSM/UMTS promotes true competition between operators and services, and has led to an average penetration rate of 80%, one of the highest in the world. IMT-2000/UMTS will continue to promote true competition in networks, devices, services and third party-developed applications.</p> <p>Competition is between operators on the availability of services due to improvements and evolution of open and available standards.</p>
<p>What is the impact on competitiveness of the EU in comparison with non-EU regions?</p>	<p>This will not provide the same advantage for the European IMT-2000 based industry due to the fact that the European industry will have to split their resources and efforts for development of additional products and systems without having certainty of achieving sufficient economies of scale.</p>	<p>Europe is traditionally very strong in telecommunications and IMT-2000 is a vehicle to European industry to keep this leading position based on common, competitive and open standards developed in parallel with CEPT regulations.</p>
<p>What is the impact on innovation and research?</p>	<p>Research capabilities are spread among several technologies and ideas and as there is no regulatory certainty, some long-term innovative developments may not happen.</p> <p>This may hamper innovation in Europe (e.g. the EU funded Framework and research projects) but the outcome of the EU funded framework and</p>	<p>The degree of innovations made in conjunction with the development of IMT-2000 is an enormous achievement by European industry. It has been facilitated by the clarity, timeliness and stability of European regulations. The innovations have been focused on IMT-2000 and its evolution. This</p>



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	<p>research projects should mainly drive the innovation in Europe.</p> <p>It should be noted that innovation and research are not limited to 2.6 GHz band and other bands can be made available, when justified.</p>	<p>IMT-2000 standards platform has also sparked the innovative power among smaller European companies in the component, services and applications industries.</p> <p>Close and early cooperation with standardization bodies and regulation are good bases for successful market implementation.</p>
<p>What is the impact on consumers?</p>	<p>Allowing technology choice can often enhance competition but on the other hand, too much emphasis on technology neutrality could harm competition in both services and terminals. The reason for this is that true competition is stimulated by consumers being able to change hardware (TV, mobile phone etc) or service provision independently. Proliferation of incompatible technologies will frustrate this, as services become linked to specific standards and hardware. This can lead to a more complex user situation due to a larger variety in different user interfaces, services, and functionality. Smaller selection of user equipment per each technology and limited service availability in some technologies. Increased requirement for more expensive multimode devices.</p> <p>Changing of service provider operator may be more costly, as it may require purchase of new equipment.</p> <p>The interoperability of consumer terminals with different networks will be impossible when air interfaces are different and</p>	<p>Common air interface (or a limited set of IMT-2000 air interfaces) would facilitate interoperability, global roaming, wide choice of operators/service providers, large selection of user equipment in many price ranges. IMT-2000 systems provide reliable emergency calls and positioning services. IMT-2000 networks provide emergency backup systems and coverage in subways and tunnels which are important from a safety point of view.</p>



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	interoperability between services is also likely to decrease.	
What is the impact on employment and the labour market?	Employment might be shifted to Asia and Americas mainly.	Employment remains and new jobs are created in Europe, as Europe has been traditionally strong in co-operation based mobile industry.
What is the impact on social inclusion and protection of particular groups?	<p>Quality of Service for all technologies may not be specified at the same level as in a coordinated approach.</p> <p>More complex user situation as the available options differ a lot e.g. in their user interfaces, services and functionality. There is less choice of user equipment per each technology and limited service availability in some technologies and perhaps a need for more expensive multimode devices.</p> <p>Reduced network coverage to commercially unviable areas, which will negatively impact social inclusion.</p>	The guaranteed real-time services offered by IMT-2000 are important and easy to use (as they are like 'normal' telephones) also by disabled people. Extensive and stable coverage provides safety and comfort to many different user groups in the European society.

Furthermore, interested parties are invited to comment on the following issues:

1. The timing of a Commission Decision;
The UMTS Forum supports Decision ECC/DEC(05)05 adopted by the ECC that harmonises the band 2500-2690 MHz for IMT-2000/UMTS. The UMTS Forum does not see the need for a separate Commission Decision in addition to the ECC Decision.
2. The issue of interoperability in order to achieve seamless services;
Interoperability is an essential requirement for any mobile communications network to achieve successfully commercial services and is a consequence of the harmonized approach taken in developing IMT-2000. In IMT-2000/UMTS, interoperability it is a key feature.
3. Any other points you find relevant.

Today's harmonisation of European 3G is not coincidental but results from a strategy democratically designed since the 1990's:



A public debate was initiated in 1997 by broad EU-wide consultation based on two Communications from the Commission to the European Parliament and the Council which both approved the emerging orientations. This resulted in the UMTS Decision 99/128 and reflected the will of the legislator (Parliament and Council):

- A common, open and competitive international air-interface standard, as well as the roaming rights and obligations made possible by this common interface
- Mechanisms associating CEPT to the Union for the harmonisation of the frequency bands to be allocated to UMTS
- The conditions attached to UMTS licenses in order to ensure that pan-European services would be based on ETSI standards

In January 2003, pursuant to this UMTS decision, a decision was adopted by the common licence/UMTS committee (unanimous vote on a proposal from CEPT), which designated the frequency band 2500 – 2690 MHz to UMTS/IMT-2000 systems, not for anything else.

If the Commission is planning a departure from this well established policy, which is currently the basis for the business plans of the majority of operators and manufacturers, it has to go through the same procedure as it used to establish it, i.e. at least a Communication to the Parliament and Council launching a public consultation.

An important consideration is the current political focus on interoperability. A change of the current policy of harmonization will certainly have implications for interoperability on different levels: terminal to network interoperability will be more complex and expensive due to multiple air interfaces and network and service interoperability will be problematic and costly.