

UMTS Forum

Title: Response to the RSPG Consultation on the context of the development of an RSPG Opinion on priorities and objectives for the Community in the World Radiocommunication Conference 2007

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UMTS Forum Response

To the RSPG Consultation

‘Context of the development of an RSPG Opinion on priorities and objectives for the Community in the World Radiocommunication Conference 2007’

The UMTS Forum congratulates all the national and EU institutions, which are members of RSPG for their interest in WRC-07 issues in general and for this consultation on the development of an RSPG opinion of priorities and objectives for the Community in WRC-07 in particular.

The Forum represents a significant group of spectrum users which are directly interested in the results - in terms of spectrum - of the next WRC and in particular under agenda items 1.4 and 1.9 which are of major importance for its members. The UMTS Forum gathers all the kinds of players involved in third generation mobile systems, including equipment manufacturers, operators, administrations, service providers and software developers.

The UMTS Forum welcomes the opportunity to comment to the RSPG consultation concerning the next World Radiocommunication Conference and is happy to provide an overview of the Forum's thoughts concerning WRC-07 interests in response to the following RSPG questions:

1) What are the agenda items at WRC-07 (to be specified by the respondent) which potentially could have a significant positive or negative impact on common European policies and on important pan-European industrial sectors?

From the Forum's perspective there are two WRC-07 agenda items, which are of major importance for pan-European industry and in particular mobile sector, namely 1.4 and 1.9:

1.4 to consider frequency-related matters for the future development of IMT-2000 and systems beyond IMT-2000 taking into account the results of ITU-R studies in accordance with Resolution **228 (Rev.WRC-03)**;

1.9 to review the technical, operational and regulatory provisions applicable to the use of the band 2 500-2 690 MHz by space services in order to facilitate sharing with current and future terrestrial services without placing undue constraint on the services to which the band is allocated;

- Agenda item 1.4

UMTS Forum believes that there are two aspects under this agenda item which have to be studied deeply:

- new bands for the high bit-rate evolution of IMT-2000;
- extension of UMTS/IMT-2000 in the bands below those already identified for IMT-2000 in order to provide coverage for large areas with low population density;

Agenda item 1.4 is extremely important for the European Telecoms industry to continue the development of mobile communications, which has a strong social and economical impact for the whole society. Agenda item 1.4 is also important for the European Telecoms industry to maintain its leadership in the mobile communications. New developments in mobile communications, including innovative advanced services, require complex technology, the provision of which at reasonable cost requires global market and the benefits of economies scale. Globally common frequency bands are still the basic element for the global harmonization, which is the prerequisite for the development of economies of scale.

It is assumed that the future development of IMT-2000 and systems beyond IMT-2000 will provide enhanced capabilities, such as extended system capacity and higher (than current IMT-2000) bitrates. It is expected that, especially, the high bitrate with the mobility requirement cannot be offered in the current frequency bands identified for IMT-2000 but will require a new spectrum.

The UMTS Forum believes there can be social, economical and environmental benefits of providing UMTS/IMT-2000 coverage for large areas of low population density in bands below those already identified for IMT-2000.

Some Asian countries, especially, Japan and Korea, are already very active in the WRC-07 preparations on systems beyond IMT-2000 in ITU-R WP8F. To participate fully in the WRC-07 preparations and discussions, Europe needs to strengthen its vision and objectives for the future development of IMT-2000 and systems beyond IMT-2000. A view about the possible frequency bands is needed as well, as some countries, such as Japan, are already considering which frequency bands would be suitable for systems beyond IMT-2000.

- Agenda item 1.9

Europe was successful in WRC-2000 and got its primary candidate band 2500 – 2690 MHz identified as an global IMT-2000 band. It is important to ensure the usability and availability of this band as globally as possible in a cost efficient manner also in and after WRC-07.

CEPT has identified the band 2500-2690 MHz as the primary extension band for UMTS/IMT-2000, in response to Commission Mandate 4. CEPT has recently taken the decision to designate the whole IMT-2000 extension band for terrestrial UMTS/IMT-2000 in response to the Commission Mandate 5.

From European point of view, the objective of this agenda item will be to ensure the full protection of the future deployment of terrestrial UMTS/IMT-2000 in this band from satellite interference, this objective should be reached on a global basis. Another objective is to ensure that no constraint are imposed on terrestrial UMTS/IMT-2000 in view of protecting satellite services.

The results already achieved at WRC-03 corresponding to the protection of terrestrial IMT-2000 from BSS sound interference should also be secured.

Besides the contributions to technical and regulatory studies, policy support is considered to be necessary to represent European interests for global availability of the band 2500-2690 MHz for IMT-2000 prior and during the Conference, in the negotiations and in bilateral meetings EC-Japan, EC-China, etc.

UMTS Forum considers also that, additionally, the agenda items 1.20, 7.1 and 7.2 are relevant for the mobile industry.

- Agenda item 1.20

In the process of reconsideration of regulatory measures to protect EESS (passive) from unwanted emissions of active services, it should be ensured that the operation of other existing (and future) services will not be restricted by undue strict requirements.

- Agenda item 7.1

The Report of the Director of the Radiocommunication Bureau will be considered and approved under this agenda item. It covers the activities of the Radiocommunication Sector since WRC-03 including any difficulty or inconsistency encountered in the application of the Radio Regulations. Action in response to Resolution 80 (Rev.WRC-2000) and Resolution 951 are also identified as relevant for UMTS Forum.

- Agenda item 7.2

It is important for Europe to give its views on the preliminary agenda for the subsequent conference and on possible agenda items for future conferences, taking into account Resolution 803 (WRC-03). Some items in the preliminary agenda for WRC-10 are already identified as relevant for UMTS Forum e.g. development and regulatory requirements of terrestrial wireless interactive multimedia applications (TWIM).

2) Which are the broad objectives which Europe could set itself for these agenda items, bearing in mind that many technical constraints are not yet clarified, and the fact that non-European interests might not support such objectives during the negotiations?

Agenda item 1.4:

The final objective is the identification of a suitable and sufficient new spectrum for the future development of IMT-2000 and systems beyond IMT-2000. The new spectrum needs to fulfil the capacity and mobility needs of the systems beyond IMT-2000 and also the expressed coverage needs of large areas of low-population density.

These objectives cover two aspects under this agenda item, which have to be studied deeply. It should be noted that the identification of the "coverage band" only couldn't fulfil the agenda item, especially for the high bit-rate evolution of IMT-2000 and systems beyond IMT-2000.

As there are today questions and uncertainty about the real need for new bands, EC should be active in supporting studies about the future trends in mobile use and market development. In addition to assisting the WRC-07 preparations, these kinds of studies could strengthen the European position in this area.

Agenda item 1.9:

The 2500 – 2690 MHz should be protected against interference from the various satellite services and should remain available for terrestrial IMT-2000 in all countries that want to use it for IMT-2000. The possible new regulatory provisions should not restrict the IMT-2000 implementation.

Agenda item 1.20:

While protecting the EESS (passive) operation, care should be taken that new undue limits will not be set for the active service to restrict their operation more than absolutely necessary.

3) Is it currently foreseeable that there could be contrasting requirements for different Community policies, which would need to be interpreted preferably before the WRC-07 negotiations? If so, where?

Agenda item 1.20 could contain this kind of elements.

4) How to effectively promote at the conference and within ITU the Common Proposals on spectrum selected by Europe in other regions of the world, in order to enable European industry and consumers to benefit from lower barriers to trade and greater economies of scale?

Promotion is needed before WRC-07, especially, in agenda items 1.4 and 1.9.

Studies and reports on the future trends in mobile markets and usage would assist the promotion of European objectives on agenda item 1.4 for the high bit-rate evolution of IMT-2000 and systems beyond IMT-2000. EC should continue the promotion of globally common spectrum and the benefits of economies of scales. These topics have been said earlier but they are still very valid elements for mobile services.

Regarding the promotion of agenda item 1.9, a clear European commitment and plans to implement IMT-2000 in the band 2500 –2690 MHz would best serve the purpose.

5) How to ensure that generic regulatory principles enshrined in Community legislation for various spectrum-using sectors are supported in the WRC-07 process, and notably the principles of technology neutrality, fair competition, regulatory transparency, non-discrimination and proportionality, as well as the optimisation of spectrum use?

Generic regulatory principles are best guaranteed by an open and transparent preparation procedure, where all interested bodies/companies can participate.

6) What should be the strategy approaches before and during the conference for European delegations to optimise the possibility to reach the above-identified common European objectives? Should some European Common Proposals be mandatory for EU members?

In general, voluntary commitment is usually achievable in many cases. Acting as individual administrations with a common objective has been successful approach in a number of conferences. If the ECPs are mandatory, there may be a risk that EC will be considered as one entity (with one vote) instead of 25 votes with the same objective. Mandatory commitments could only be used, if the preparation process for WRC-07 is becoming unsuccessful in terms of developing common position on essential topics.

7) Are the current procedural arrangements for the European WRC preparations, such as participation to and scheduling of meetings, drafting of European Common Positions and Briefs, availability of information, etc., appropriate? If not, please suggest ways to improve this process.

In general, the current preparations in Europe are working well and are well organized. One proposal for a slight improvement could be to support even better industry participation in all levels of the European preparations, when it adds the European competence of the work.

8) If applicable, please indicate your early views on issues Europe could propose to be included in the agenda for the next conference after WRC-07 (see the preliminary agenda proposed by WRC-03 in annex 3).

Agenda item 2.8 in Resolution COM7/B (WRC-03) (development and regulatory requirements of terrestrial wireless interactive multimedia applications) is an important topic to the telecoms industry and should be kept on the agenda of the next WRC.