

## **UMTS Forum response on the Norway consultation on the frequency plan for the bands 2500-2690 and 2010-2025 MHz**

UMTS Forum welcomes the opportunity to respond to the NPT public consultation on technical conditions for the frequency bands 2500-2690 and 2010-2025 MHz.

The UMTS Forum represents a significant group of spectrum users, who are interested in the development of public mobile communication networks including UMTS/IMT-2000 and, especially, its related spectrum topics. UMTS Forum is a cross sector group with many different players involved in third generation (3G) mobile communication systems, including equipment manufacturers, operators, administrations, service providers and software developers.

In line with the previous Forum comments in May 2007 UMTS Forum would like to repeat its comments, especially, related to the Norway plans on the future use of the band 2500-2690 MHz:

Based on the estimated future traffic increase, UMTS Forum believes that there are predicted needs for the extension of the UMTS/IMT-2000 services in the band 2500 – 2690 MHz, and that harmonization of the band usage remains to be necessary to provide clarity, and, generally, having a predictable regulatory framework in place to be able to develop technologies and services in a timely manner.

UMTS Forum considers the band 2500 – 2690 MHz as the most important, and the only available, international extension band for UMTS/IMT-2000, which is going to be available for the evolution of IMT-2000 standards and services up the point in time where spectrum identified at WRC-07 would be made available, perhaps around year 2015.

The UMTS Forum has serious concerns on the idea to consider deviation from the European harmonised channelling arrangements as specified in ECC DEC(05)05. A varied frequency plan in terms of TDD and FDD spectrum arrangements would lead to a less efficient use of spectrum (significant amount of spectrum is wasted in guard bands) and ultimately impact consumers' benefits. A national band plan would lead to country specific equipment that will be more costly and with reduced roaming capabilities with other European countries. Also, the timely availability of suitable equipment is questionable. Therefore, UMTS Forum strongly advocates the view that the bands 2500 – 2570 MHz and 2620 – 2690 MHz should be reserved for the FDD usage, in line with ECC/DEC/(05)05.

UMTS Forum supports the spectrum arrangement regarding the paired sub-bands 2500 – 2570 MHz and 2620 – 2690 MHz also as being essential for UMTS/IMT-2000 and its long term evolutions (LTE) system to provide the consumers with public mobile broadband communication services. These paired sub-bands will be essential to provide the more capable broadband services using wider channel bandwidth, but still adhering to the 5 MHz channelling arrangement in accordance with ECC/DEC/(05)05.



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UMTS/IMT-2000 is based on 3GPP standards, which take into account the general (i.e. regional) regulations for the spectrum use. Open standards and economies of scale are