



Europe

## Position Paper

### **GSMA Europe Response to ECO Consultation for draft ECC Report 146 'COMPATIBILITY BETWEEN GSM MCBTS AND OTHER SERVICES (TRR, RSNB/PRMG, HC-SDMA, GSM-R, DME, MIDS, DECT) OPERATING IN THE 900 AND 1800 MHz FREQUENCY BANDS'**

19<sup>th</sup> April 2010

In response to the public consultation on draft Report 146, GSMA Europe would like to make the following points:

- 1. General remarks:** GSMA Europe is fully supportive of the conclusions of the draft Report 146 and believes that GSM Multi Carrier BTS can be successfully implemented with no additional constraints compared to Single Carrier GSM Base Stations.
- 2. MCBTS co-existence with adjacent band services:** The draft Report contains a comprehensive analysis that has been developed in the ECC PT1 group and WG SE7 over one year with close consultation with ETSI and 3GPP TSG GERAN in addressing adjacent band co-existence studies.
- 3. The implementation of GSM MCBTS in the 900/1800 MHz bands:** With regard to co-existence with GSM-R, the introduction of GSM Multi-carrier Base Station would not change the interference environment compared to the usual GSM/UMTS technologies.
- 4. Issues expected to be raised during the Public Enquiry:** With regard to co-existence with the aeronautical services, the mobile community is confident that mobile equipment performance above current specification level will resolve any concerns concerning co-existence. However, the intensive work on this issue has in particular enabled a better modeling of the operational mode of the DME system and to refine the coexistence studies compared to the ones developed in ECC Report 96.

Arguments underpinning these points are detailed overleaf. Please do not hesitate to contact us if you have any questions.

The GSMA represents the interests of the worldwide mobile communications industry. Spanning 219 countries, the GSMA unites nearly 800 of the world's mobile operators, as well as more than 200 companies in the broader mobile ecosystem, including handset makers, software companies, equipment providers, Internet companies, and media and entertainment organisations. The GSMA is focused on innovating, incubating and creating new opportunities for its membership, all with the end goal of driving the growth of the mobile communications industry. In the European Union the GSMA represents over 100 operators providing more than 600 million subscriber connections across the region.

## **1. General remarks**

GSMA Europe would like to thank the European Communications Office (ECO) for giving stakeholders the opportunity to comment on draft ECC Report 146 'COMPATIBILITY BETWEEN GSM MCBTS AND OTHER SERVICES (TRR, RSBN/PRMG, HC-SDMA, GSM-R, DME, MIDS, DECT) OPERATING IN THE 900 AND 1800 MHz FREQUENCY BANDS'. GSMA Europe is strongly supportive of the adoption of Report 146 without any changes.

## **2. MCBTS co-existence with adjacent band services**

GSMA Europe believes that the implementation of Multi Carrier Base Transceiver Stations (MCBTS) is an important step in the evolution of mobile service networks that will not introduce any new interference scenarios compared to Single Carrier Base Transceiver Stations (SCBTS). The co-existence with adjacent band services have been studied for over one year in great detail by industry experts in the CEPT, ETSI and 3GPP TSG GERAN. The draft Report concludes that a combination of conventional mitigation techniques and accounting for actual equipment performance (beyond the relevant Standard requirements) will be sufficient to resolve any potential problems.

## **3. The implementation of GSM MCBTS in the 900/1800 MHz bands**

The development of MCBTS is an essential element in the upgrade of mobile service networks with a practical solution now available for implementation. The Multi-carrier capability is offering higher flexibility in terms of traffic management and thus, is contributing to the huge efforts to get the highest efficiency scheme. The mobile community clearly understands the importance of managing the implementation of MCBTS with neighbouring band services and believes that the equipment development has accounted for all co-existence scenarios through work in the CEPT, ETSI and 3GPP. Therefore GSMA Europe wishes to stress the importance that this in a very opportune time for networks to improve their performance to the user.

## **4. Issues expected to be raised during the Public Enquiry**

GSMA Europe members and representatives of other services have been active in developing the draft Report in several committees across the CEPT, ETSI and 3GPP. During the finalisation on the draft Report comments were raised at the February 2010 CEPT Working Group Spectrum Engineering concerning Aeronautical Radio Navigational Service ARNS and GSM-R matters which are expected to be elaborated in further detail during the Public Enquiry phase.

With regard to the co-existence with GSM-R services, we note that the GSM-R community has actively participated in the development of the studies and that WGSE SE7 has a work item on GSM-R practical coordination methods where the concerns expressed by the UIC will be addressed. In particular, the assumptions within Report 146 have been agreed with the GSM-R community and special attention has been placed on worst-case scenarios following their requests. GSMA members are surprised by the concerns expressed by UIC at the last WG SE meeting where they mentioned that current GSM systems have caused harmful interference into GSM-R networks across Europe (notably in Germany, Sweden, Finland, and France). GSMA members are not aware of any reports of interference and it would be necessary to assess in more detail the problems mentioned by the UIC before making any changes to Report 146.

WGSE also invited the Russian Federation to contribute to the public consultation on issues dealing with co-existence with the ARNS (RSBN/PRMG). GSMA Europe understands that these issues have already been addressed by WGSE SE7 and therefore we believe that these issues can be finalised at the WGSE SE7 resolution meeting for Report 146.