



GSM Europe comments on the draft Commission Decision on the harmonisation of the 900 MHz and 1800 MHz frequency bands in the Community

GSM Europe¹ (GSME) welcomes the publication of Communication COM(2007) 50 on making spectrum use more flexible. We agree that there are certain practical steps that are necessary to pave the way towards more flexible spectrum management prior to the full implementation of flexibility envisaged in the review of the regulatory framework.

In this context, GSME is pleased to note that the European Commission (EC) and Radio Spectrum Committee (RSC) have made significant progress over recent weeks in the development of the draft EC Decision on the harmonisation of the 900 MHz and 1800 MHz bands in the Community. Such a Decision confirms that a minimum level of co-ordination is required both to safeguard the continued use of these frequency bands for GSM and to introduce the additional flexibility required to allow 3G/UMTS to be deployed in these bands, and we fully support this work. GSME looks forward to seeing the Decision adopted by the RSC.

With regard to the draft Decision², GSME wishes to indicate our specific support for:

- the protection of continued use of the 900 MHz and 1800 MHz bands for GSM where there is demand (recital 7 refers);
- the designation of the 900 MHz and 1800 MHz bands for terrestrial pan-European *mobile* communications systems (recital 9 refers);
- the need for prospective new systems to demonstrate technical compatibility with adjacent networks before being authorised (recital 10 refers);
- the proposed process for inclusion of new systems (recital 11 refers);
- the inclusion of UMTS as the first system to be authorised (recital 12 refers);
- the retention of the 900 MHz and 1800 MHz frequency bands as harmonised spectrum for terrestrial pan-European *mobile* communications to ensure optimum efficiency and to maximise economy of scale benefits (Article 1 refers);
- the proposal that systems and technical parameters referenced within the Annex demonstrate sufficient technical compatibility (Article 4 refers); and
- the proposal that MS keep the use of the 900 MHz and 1800 MHz bands under review to ensure efficient use (Article 5 refers).

We comment further on a number of these points below.

Protection of continued use of the bands for GSM

In practice, operators are likely to maintain both technologies (GSM and 3G/UMTS) for a long period of time. It is therefore important, when defining the technical parameters associated with the demonstration of technical compatibility with GSM in the Annex of this Decision, that the relevant compatibility studies are adequately referenced or summarised in order to protect existing GSM services appropriately. In the case of UMTS, compatibility studies are available

¹ See below for further information on GSM Europe and the GSM Association.

² References are given to the version of the draft Decision in RSCOM06-113.

in ECC Report 82 and draft ECC Report 96. GSME notes that these Reports conclude that UMTS900/1800 can be deployed in urban, sub-urban and rural areas in co-existence with GSM and/or UMTS under a number of conditions. These conditions should be considered when introducing UMTS in the GSM bands.

Date of implementation

The GSM Association is currently preparing a Report which considers the relative merits of using, in particular, the 900 MHz and 850 MHz bands for UMTS services. Initial studies indicate that there are likely to be significant economic benefits from allowing the use of these lower frequency bands for 3G services. This would allow wider and faster take up of 3G services in Europe. A Decision that allowed for the use of the GSM bands for UMTS in Member States will help to provide the incentive for the industry to begin the process of changing use from GSM to 3G/UMTS. An early date of implementation would allow operators to seed the market with multi-band dual mode handsets that can use both GSM and UMTS in these bands.

Legacy issues

GSME recognises that the actual implementation of 900/1800 MHz refarming will require in most Member States a modification of existing authorisation/spectrum rights of use. Such modifications should be objective and proportionate and will require a public consultation of the interested parties before being implemented as provided by art. 14 of the Authorisation Directive.

GSME would encourage NRAs at a national level to pursue as soon as possible the resolution of any legacy issues related to the introduction of UMTS in the GSM bands, including *inter alia* technical issues and licensing issues. Technical issues include, in some countries, that the band may need to be rearranged to create the minimum spectrum blocks required for a UMTS channel. Many operators consider that licensing issues include, that there may be insufficient access to appropriate spectrum.

In particular GSME notes that there are differences in the spectrum holdings of licensed operators in most Member States, and many operators support the proposal that individual Member States should review the use of the 900 MHz and 1800 MHz bands; this review should not only be based on efficient use of these bands but also should take into account national legacy issues as described above. To ensure that this is done these operators would urge the RSC to clarify in the recitals to the Decision that Member States must consider such matters and to consult in order to allow the use of these bands for 3G services as soon as possible.

Link between UMTS at 900 MHz / 1800 MHz and the digital dividend

The scarce amount of spectrum for mobile services at low frequencies means that there is a need to look at the long term requirements of mobile operators for additional spectrum below 1 GHz. GSME considers that it is of the utmost importance for the continuing success of the broadband mobile sector that operators can gain access to more spectrum below 1 GHz. This is important as it will help avoid in many countries the opening of a mobile "digital divide" between urban areas and rural areas. It is therefore recommended that administrations support an early allocation at WRC-2007 of the band 470-862 MHz to the mobile service, and an identification of a harmonized sub-band for IMT at the WRC-2011.

Conclusions

GSME believes it is important, when defining the technical parameters associated with the demonstration of technical compatibility with GSM in the Annex of this Decision, that the relevant compatibility studies are adequately referenced or summarised in order to protect existing GSM services appropriately.

GSME believes that the date of implementation of the new Commission Decision with regard to UMTS should be as soon as possible, because of the long lead times required to produce suitable dual mode and multi-band handsets, and the length of time needed to seed the markets with handsets.

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GSME believes that the Decision should be adopted by the RSC at its next meeting in March 2007.

**GSM Europe
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About GSM Europe

GSM Europe is the European Interest Group of the GSM Association, the premier global body behind the world's leading wireless communications standard. GSM Europe represents around 147 operators in 50 countries/areas in Europe and counts around 600 million subscribers.