



Europe

**GSMA Europe comments
on the Commission proposal to amend Directive 87/372/EEC on the
frequency bands to be reserved for pan-European mobile
communications in the Community**

9 January 2009

Martin Whitehead
Director GSMA Europe
Diamant Building
Bldv. A. Reyers 80
B- 1030 Brussels
Tel: +32 2 706 81 06
GSM: + 32 475 522 054
E-mail: mwhitehead@gsm.org
www.gsmeurope.org



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GSMA Europe¹ (GSMA/E) welcomes the publication of Communication COM(2008)0762 proposing an amendment to Council Directive 87/372/EEC on the frequency bands to be reserved for the coordinated introduction of public pan-European cellular digital land-based mobile communications in the Community. We agree that the frequency bands mainly used in Europe at present for GSM systems (at 900MHz and 1800MHz) should be opened up to other systems capable of providing electronic communications services, as long as they safeguard the continued operation of GSM systems where required.

GSMA/E is pleased to note that UMTS is specifically proposed to be allowed under the revised Directive, since this system has already been studied by the CEPT under Mandate from the European Commission (EC) and since the EC through the Radio Spectrum Committee (RSC) has already developed a final draft Commission Decision on the harmonisation of the 900 MHz and 1800 MHz frequency bands in the Community (RSCOM07-04 Final). From our point of view, UMTS and its evolutions including LTE are also the best suited technologies to provide pan-European digital land-mobile electronic communications services. We expect this Decision to form the basis of the new harmonised technical conditions to be adopted under the European Parliamentary and Council Decision 676/2002/EC (the Radio Spectrum Decision – RSD) following adoption of the amended Directive. The Commission 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 UMTS and its evolutions to be deployed in these bands, and we fully support this conclusion.

With regard to the amended Directive, GSMA/E wishes to indicate our specific support for:

- the continued availability of the 900 MHz band (and indeed the 1800 MHz band as well) for GSM where there is demand (recital 4 refers);
- the inclusion of UMTS as the first additional system to be allowed as its ability to co-exist with GSM has already been demonstrated; and the possibility for other prospective new systems to be deployed in the band once it has been demonstrated that they can co-exist with GSM and UMTS in accordance with the procedure in the RSD (recital 8 and Article 1.1 refer);
- the proposal that legacy issues are considered by Member States under the existing regulatory framework (recital 5 and Article 1.2 refer).

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



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Continued availability of GSM bands for GSM where there is demand

In practice, operators are likely to maintain both technologies (GSM and UMTS) for a long period of time. It is therefore important, when defining the new harmonised technical conditions, 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 in ECC Reports 82 and 96. GSMA/E 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 has published a Report which considers the relative merits of using, in particular, the 900 MHz and 850 MHz bands for UMTS services². The Report indicates 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 revised Directive and associated Commission 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. The UMTS900 ecosystem is now ready for roll-out with a large availability of handsets and base stations. Several European and international operators have already started their UMTS900 roll-out.

Systems in adjacent bands

GSMA/E takes this opportunity to highlight that the protection for systems in adjacent bands to 900/1800 MHz bands should be reciprocal. Specially, as indicated in the "Whereas (9)" of the draft Commission proposal, only appropriate protection of existing and prospective civil aviation systems in above 960 MHz is mentioned. The protection of GSM, UMTS and any additional mobile system below 960 MHz needs also to be taken into account by adjacent bands users.

Conclusions

GSMA/E believes it is important, when defining the new harmonised technical conditions, that the relevant compatibility studies are adequately referenced or summarised in order to protect existing GSM services appropriately.

GSMA/E believes that the date of implementation of the amended Directive and associated Commission Decision with regard to UMTS should be as soon as possible because suitable dual band and multi-band handsets are already available in large number.

GSMA/E believes that the Directive should be adopted by the European Parliament and Council at its first reading with a modification of the "Whereas (9)" in order to better reflect an equal access basis to the spectrum.

² A Summary Report from Ovum Consulting to the GSM Association "UMTS900 – Benefits and Issues", February 2007, is available at: http://gsmworld.com/documents/umts900_exec_sum.pdf.



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About GSMA Europe

GSMA 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.

About the GSM Association

Founded in 1987, The GSM Association (GSMA) is a global trade association representing more than 690 GSM mobile phone operators across 213 territories and countries of the world. In addition, more than 160 manufacturers and suppliers support the Association's initiatives as associate members.

The primary goals of the GSMA are to ensure mobile phones and wireless services work globally and are easily accessible, enhancing their value to individual customers and national economies, while creating new business opportunities for operators and their suppliers. The Association's members serve more than 2 billion customers – about 80% of the world's mobile phone users.

The GSMA believe that the promotion of open, competitive market conditions is fundamental to extending the benefits of mobile communications to all, from the most developed Western European and North American markets to remote areas in Developing Countries. Mobile has a critical role to play in improving health, wealth, education and social mobility. To this end the GSMA launched its emerging market handset programme to produce sub \$30 US GSM handsets. The GSMA also hopes to replicate this handset program for 3GSM enabled handsets.

The GSMA believes that the low costs associated with GSM handsets are only possible because of the benefits of economies of scale in handset production. These economies of scale are only possible through international harmonisation.