



ETNO response to the European Commission Call for Evidence on the World Radiocommunication Conference 2023 EU position

ETNO appreciates the opportunity to provide comments to the European Commission Call for Evidence on the World Radiocommunication Conference 2023 EU position.

ETNO emphasizes the importance of spectrum policy in reaching the European Union Digital targets. Mobile operators are engaged to fulfil the 2025 Gigabit and 2030 Digital Compass objectives. However, we need the EC and member states to carefully consider in all their work how to reflect the targets in a well-designed spectrum policy. This is critical, otherwise we risk staying far behind the targets and behind other markets.

European policymakers have had a strong focus on ensuring competition and low customer prices, which has also led to the situation that European mobile market has lower revenues, and slower 5G take-off compared to the North American and East Asian peers. European mobile and fixed telecoms service revenue decreased by 18% over the decade between 2009 and 2019 while the level of investment sustained by telecom operators has remained stable. Communication services in the EU have suffered earlier and deeper price erosion than other global leaders such as the US, South Korea or Japan¹².

Sufficient spectrum availability in low, mid, and high bands, with reasonable prices and feasible conditions, is critical for supporting the Digital targets, and continuously increasing society demands for mobile broadband connectivity. **In addition to ensuring that already harmonized IMT spectrum bands are awarded and licenses renewed with approaches that support a sustainable mobile market, additional spectrum will be needed for meeting future demands.**

ETNO would like to underline the importance of the Conference decisions for the EU policies and the development of mobile equipment ecosystem for supporting the future society demands. The outcomes of WRC-23 will be paramount to achieve a predictable supply of new harmonized

¹ [State of Digital Communications, Analysys Mason, 2022](#)

² [Connectivity and Beyond: How Telcos Can Accelerate a Digital Future For All, BCG, 2021.](#)



spectrum to enable the growth of the mobile broadband, which is an important driver of economic growth in all European member states. In particular, decisions on the WRC-23 agenda items 1.2, 1.3 and 1.5 on additional spectrum resources for mobile connectivity will be critical for achieving the Digital targets for people and businesses and the future performance and deployment of IMT technologies in Europe. European society is dependent on broadband connectivity and demand is continuously increasing which needs to be considered also when deciding on the agenda for the subsequent WRC-27.

We expect EU positions and actions in WRC-23 to support meeting the demands that societies will have for IMT services also in the future.

WRC preparation in Europe

ETNO recognizes the different work streams within Europe and is actively contributing to all of them. We have provided our positions to both CEPT and RSPG to input relevant mobile stakeholder positions into the European decision-making process. ETNO considers agenda items 1.2, 1.3 and 1.5 as high priority for the development of the European but also global mobile market and would like to share its proposals for those.

Agenda Item 1.2 (IMT mid-band identifications)

This agenda item aims to make additional mid-band spectrum available for IMT networks to support a continued mobile broadband expansion which is required to meet the future demands for high quality service to the European customers.

ETNO is focussing on the band 6425-7125 MHz which is the only realistic opportunity for making available new mid-band spectrum allowing for sufficiently wide contiguous bandwidth per operator in Europe. There is a large demand for mid-band spectrum for 5G in the future, in total about 2 GHz by 2030, according to a study prepared by Coleago. This study and other reports on 6 GHz are available at “Licensed 6 GHz opportunity” webpage.³ This band will be needed especially in urban areas (e.g. for outdoor-to-indoor and city-wide

³ [Licensed 6GHz for 5G: An Opportunity for Society \(6ghzopportunity.com\)](https://www.6ghzopportunity.com/)



coverage), but also to enable the provision of more advanced 5G services to a larger part of the population in areas which are not feasible to be covered with mmWave bands.

Therefore, ETNO supports an IMT identification for 6425-7125 MHz at WRC-23 and invites the European Commission to consider supporting this position.

[Agenda Item 1.3 \(MS 3 600-3 800 MHz\)](#)

The frequency range 3.4-3.8 GHz has been defined as one of the 5G pioneer bands for Europe. As part of this range the 3600-3800 MHz is of great importance for the provision of mobile broadband 5G services. The band is currently harmonised and in use for mobile/IMT in the EU and an upgrade of the allocation from secondary to primary in Region 1 would help to confirm and protect that use. Primary allocation may ease the cross-border coordination with countries outside the EU and help to agree on reasonable conditions.

Therefore, ETNO supports the primary mobile allocation of the band 3600-3800 MHz, provided that the current European harmonized conditions for use by IMT would not be limited.

[Agenda Item 1.5 \(UHF Review\)](#)

The agenda item 1.5 deals with the question of additional spectrum below 1 GHz being an enabler for digital equality and economical and technical viable delivery of comparable mobile broadband connectivity to less populated areas. The frequency range under discussion (470-694 MHz) provides good propagation properties and allows an efficient re-use of already existing network sites for the provision of additional IMT capacity and quality.

ETNO recognizes the proposed review process on the future usage of this band being foreseen for 2025. Nevertheless, we think that a decision of WRC-23 in favor of a co-primary Mobile Allocation of 470-694 MHz would create regulatory clarity and provides full flexibility for the consequential European decision on an efficient future use of this frequency range.

Therefore, ETNO supports the primary allocation of the band 470-694 MHz to the Mobile Service at WRC-23.



ETNO (European Telecommunications Network Operators' Association) represents Europe's telecommunications network operators and is the principal policy group for European e-communications network operators. ETNO's primary purpose is to promote a positive policy environment allowing the EU telecommunications sector to deliver best quality services to consumers and businesses.

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