



Response regarding work in the frequency plans in Poland in the frequency band 470 – 862 MHz.

About the GSMA

Founded in 1987, the GSMA is the global trade association of the mobile industry, representing more than 750 GSM and 3G mobile phone operators across 218 countries and territories of the world. In addition, more than 180 manufacturers and suppliers support the Association's initiatives as associate members.

The primary goals of the GSMA are to ensure that 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 represent more than 4.5 billion GSM and 3G connections.

One of the Association's goals is to promote the benefits of mobile broadband, to help foster economic growth, jobs, and social inclusion. One of the major ways of doing this is the provision of internationally harmonised spectrum in a timely manner.

GSMA Position

The GSMA believes that the band 790 to 862 MHz should be made available for mobile broadband as quickly as possible, using the CEPT preferred frequency plan, for FDD. The use of this UHF band for mobile broadband will allow the deployment of mobile broadband to happen more rapidly in rural areas, because of the lower costs associated with much greater range.

In our opinion this represents an excellent opportunity for Polish customers to improve availability of mobile broadband in rural areas and will further contribute to increase of overall broadband statistics.

The GSMA also believes that the momentum has now begun to grow with Poland's neighbours, and now may be an opportune moment to discuss the issue of cross border ARNS issues. A study by the GSMA on Russia shows that there are significant economic benefits to be had for the Russian

economy, by making the 790 – 862 MHz band available for mobile broadband.

The global development of mobile broadband

A new study¹ highlights the growth in 3G-compatible devices offered by global operators. 3G-capable devices are accounting for an increasing share of operator handset portfolios due to improved 3G network coverage, lower device costs and a focus on mobile broadband services. According to a new Wireless Intelligence study, 3G devices accounted for two-thirds of operator device portfolios in mature markets on average, and almost half of the devices offered by operators in emerging markets. The study found that dedicated mobile broadband devices such as dongles and laptop data-cards represent around 15 percent of the total devices offered by global operators.

	Operator device portfolio by technology (%)				Connections (%)	
	GSM	GSM / EDGE	WCDMA	HSPA	GSM / EDGE	WCDMA (Family)
Sweden	5	3	10	82	42	58
UK	16	28	7	49	57	43
Brazil	21	38	5	36	94	6
Argentina	21	42	6	31	93	7
Indonesia	7	33	7	53	92	8
Romania	15	27	6	52	81	19
Russia	18	44	7	31	91	9
USA	9	28	4	59	84	16

Device portfolios and connections by technology (selected markets, average), Q1 2010
Source: Wireless Intelligence

This uptake of mobile broadband in Poland, is currently just over 25% of all mobile users (ie using WCDMA/HSPA) – that is 11.5 million users out of 45 million users².

This demonstrates that we are now reaching a point where mobile broadband is moving from a niche technology, to one of the main mechanisms of delivering broadband, and that mobile consumers are also choosing mobile broadband devices, over pure voice services.

Discussion

Access to internationally harmonised UHF spectrum is a key requirement for operators to deliver mobile broadband (particularly in rural areas and within buildings). Many studies have shown (including the Analysys Mason study for

¹ <http://www.gsmamobilebroadband.com/upload/resources/files/15072010143640.pdf>

² Source Wireless Intelligence – q3 Poland

the European Commission³) how large these economic benefits can be. The study also shows that there is significant benefit from not only adopting the spectrum identified at WRC07 (790 to 862 MHz), but also from the assignment of spectrum down to 698 MHz for mobile broadband, under all realistic growth scenarios.

The GSMA also believes that it is important to adopt the preferred CEPT harmonised band plan of ECC/DEC/09/03, which is used in EU Decision 2010/627/EC - namely:

790-791	791-796	796-801	801-806	806-811	811-816	816-821	821-832	832-837	837-842	842-847	847-852	852-857	857-862
Guard band	Downlink						Duplex gap	Uplink					
1 MHz	30 MHz (6 blocks of 5 MHz)						11 MHz	30 MHz (6 blocks of 5 MHz)					

The GSMA has a preference for FDD in this band, as FDD is likely to give better rural coverage than TDD, and this band is primarily seen as a coverage band by the Association.

The Association is also aware that there are specific issues regarding ARNS use, by Poland herself and her neighbours (such as Russia). With regards to Poland's use of ARNS, we would ask that the switch-off be accelerated, so that the band is made available before the projected 2015 timeframe. There has already been a major award of spectrum in the recent German auction, which raised some €4.4 billion, of which 80% was for UHF spectrum. Other markets such as Sweden and the UK are hoping to award spectrum shortly. It would therefore make sense for Poland to try and follow this timeframe also. The earlier the spectrum is available the earlier the Polish economy can benefit from the already emerging ecosystem for UHF devices.

The GSMA has recently undertaken a study about the benefits of awarding UHF spectrum in Russia⁴. The results make clear releasing the band from ARNS use to mobile, gives some €16 billion economic benefit from the wider availability of mobile broadband. Such a study shows the potential scale of the benefits that might accrue to Poland (making corrections for different GDP per head, population, and the size of rural areas etc). It may also be of some benefit to Poland in her negotiations with her neighbours like Russia, to show that there are significant economic benefits for them also.

³ <http://www.analysismason.com/About-Us/News/Press-releases/Analysys-Mason-DotEcon-and-Hogan--Hartson-awarded-digital-dividend-study-by-European-Commission/>

⁴ http://gsmworld.com/documents/GSMA_digital_dividend_Russia.pdf

Conclusion

The GSMA believes that every effort should be made to accelerate the availability of the harmonised band 790 to 862 MHz in Poland. This includes persuading ARNS users in Poland, and Poland's neighbours who use ARNS, to work together to ensure this outcome of early availability.

We believe that coordinated efforts towards acceleration of releasing of 790-862 MHz together with neighbouring countries would eventually result in better outcome for the whole region in the long-term.

The GSMA also believes that Poland should support any initiatives with Europe to extend the 790-862 MHz band down to 698 MHz.

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