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**GSM Europe views relating to the action required under the
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GSM Europe

The European interest group of the GSM Association

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GSM Europe views relating to the action required under the 4th EC mandate to CEPT on additional IMT 2000 spectrum

GSM Europe welcomes the latest mandate from the Commission to CEPT for the harmonisation frequency usage in order to facilitate a co-ordinated implementation in the community of third generation mobile and wireless communication systems operating in additional frequency bands as identified by the WRC-2000 for IMT-2000 systems.

GSM Europe notes that the first deliverable required by the mandate is a report from CEPT covering a number of background issues. GSM Europe is of the opinion that the Report now being drafted by ECC¹ Project Team 1 should, inter-alia, address the following matters.

Mobile Satellite Service (MSS) spectrum issues

The Commission has included in the mandate possible investigation on the allocation of additional spectrum bands to satellite services. This was coherent with the results of WRC-2000 that could not exclude *a priori* a possible additional allocation to satellite services.

However, GSM Europe believes that current developments at both standardisation and market level demonstrate that there is no demand by customers and no activity by

¹ ECC – the CEPT Electronic Communications Committee. ECC will replace the former European Radiocommunications Committee (ERC) and the European Committee of Telecommunications Regulatory Authorities (ECTRA), and will have its inaugural meeting in November 2001

satellite operators for the introduction of 3G satellite services that can justify more spectrum to be allocated, in addition to that previously identified.

Therefore, GSM Europe believes that it is essential that the Report from CEPT called for by the 4th mandate re-affirms that there is no need for further allocation of frequency bands to IMT 2000 satellite systems in any of the foreseen extension bands. This position might be reviewed in light of market developments. The frequencies at 2.5 GHz should be allocated to terrestrial systems according to the timetable and modalities defined by CEPT.

Finally, it should be noted that this is the view of GSM Europe and does not necessarily reflect the views of all GSM Association members.

Which frequency band to be used?

The WRC 2000 has identified the following bands as the extension bands for IMT 2000 services in addition to the bands already defined at the WRC 1992:

900 MHz band	806-960 MHz
1.8 GHz band	1710-1885 MHz
2.5 GHz band	2500-2690 MHz

In Europe, the 900 and 1800 MHz bands have been already assigned to and will continue to be commercially used by 2G systems (GSM) in many countries for a considerable period of time.

For this reason, GSM Europe believes that CEPT work should clarify that the only additional band for 3G services in Europe is the 2.5 GHz band. Before there is any discussion on the issue of refarming of the 900 and 1800 MHz bands, it is essential that the commercial launch of 3G services is operational and some experience of market reaction has been gained that would indicate what, if any, additional spectrum action is required. Only at this time is any analysis of the projected demand level based on actual market information going to be of any use.

Any premature identification of the 900 and 1800 MHz bands as extension bands with any timeframe attached will risk creating uncertainty in the market. GSM Europe believes that the Report from CEPT should clearly separate the issue of the availability of the preferred 2500-2690MHz band from that of GSM Band refarming.

Timeframe for the extension bands

One of the main objectives of the mandate is to define a date for the effective availability of the extension bands for IMT 2000 services. The document from the Commission has provisionally defined the year 2007 as the Reference Date for the effective availability of the additional frequencies. However, this is just a reference date to be used for planning the decision process ahead.

At the moment, it is impossible to state if the additional bands will be needed before or after that date. No commercial launch of 3G services has happened yet and 2.5G (e.g. GPRS) services, that should introduce features that will be offered in the future by 3G, are still in the initial phase of introduction.

Therefore, there is no market test available that might help operators or regulators to plan the amount of additional frequencies that will be needed and in what timescale. GSM Europe agrees that the Reference Date is useful guidance, but we believe that a more important guideline to the timely availability of additional spectrum for 3rd Generation services will come through experience of the market reaction and market growth of those services. We therefore believe that the Report from CEPT should encourage appropriate flexibility in the application of the Reference Date concept.

Amount of spectrum required for the additional bands

The Mandate addresses the amount of spectrum required as part of the information required to be included in the first report from the CEPT, along with the timetable for the availability of this spectrum.

GSM Europe would like to alert CEPT to the need to avoid uncertainty in the spectrum supply and hence instability in spectrum value.

The original calculations, leading to a value of 160 MHz usable additional spectrum, were conducted by the UMTS Forum, and confirmed by the GSM Association, CEPT and ITU-R (TG8/1). It is GSM Europe's view that CEPT should confirm this requirement.

GSM Europe, London 7 September 2001