

Response to public consultation on the draft RSPG Opinion on a Radio Spectrum Policy Programme (RSPP)

European Wireless Infrastructure Association – EWIA

About us

We are the **European Wireless Infrastructure Association**, the European trade association of independent wholesale wireless infrastructure providers. Our members invest in and operate wireless infrastructure essential to the delivery of mobile voice, wireless broadband, and other wireless networks.

EWIA is a well-established presence in Europe with **ten members operating across fourteen European countries** who develop, acquire and operate communication towers together with investment in the fibre-connected small cell networks in buildings and on city streets needed for 5G. Together, our members have invested and operate over 100bn of wireless infrastructure assets globally and operate a portfolio of more than 80,000 assets in Europe, raising the share of independent infrastructure to over 20% of the wireless infrastructure in Europe.

EWIA advocates for policies that **encourage network infrastructure investment and deployment**: this is necessary to make advanced wireless broadband available everywhere for consumers, businesses, health care, intelligent transport systems, public safety and the countless other sectors that rely on dependable wireless connections. This includes ensuring better and faster connectivity in rural areas as well as edge computing infrastructures and network densification in urban areas to allow high capacity and low latency new applications.

EWIA's feedback

EWIA welcomes the opinion on the new Radio Spectrum Policy Programme (RSPP), as it creates conditions to facilitate the deployment of electronic communications networks which can help our industry to be a valuable partner to EU policymakers on relevant policy initiatives such as the Gigabit Society, the Recovery Plan, Shaping Europe's digital future and the Green deal.

In our feedback, we will highlight our views on the draft RSPP horizontally and touch upon specific issues such as the European recovery and the environmental footprint of the telecoms sector. In particular:

Vision for Europe's connectivity: EWIA welcomes the effort to ensure sufficient spectrum available to respond to European policy initiatives such as the Green Deal, Gigabit Society and Shaping Europe's digital future (5G and beyond, 6G, resilient & secure communications). EWIA is in favour of the RSPG policy target of making available at least 12 GHz of spectrum below 100 GHz (including already EU-harmonised spectrum) to promote innovative wireless services, including next generation mobile and wireless access systems (such as Wi-Fi). In this context, EWIA members can operate more swiftly and can help to enhance Europe's connectivity by attracting investments that will be critical to 5G into wholesale only, or 'neutral

host' infrastructure, which is offered on an open access basis to all mobile and other wireless operators and delivers greater levels of connectivity. €28 bn could be unlocked if outsourcing to independent infrastructures operators grew to 50% in Europe, well below the 80% actually existing in USA and other regions.

Spectrum for local networks: EWIA also support the local networks and communication systems outlined in the opinion for the new RSPP, as the programme notes that networks could be provided by mobile operators, third parties or directly by the local users themselves and that the response to demand for local spectrum can be met through spectrum leasing (voluntary/mandatory), by dedicated spectrum allocations for local networks and/or by third party operated local networks. EWIA also welcomes the plans for developing ITS and ensuring connectivity on-board. EWIA could play a role in helping to support the local networks as independent neutral host infrastructure can help provide better connectivity, faster rollout and improve coverage in rural areas.

Reduce environmental footprint: We welcome the RSPG support to the policy objectives to reduce the Union's carbon footprint, goal of zero emissions of EU economy and enhancing the technical efficiency and energy efficiency of wireless communication networks and equipment. RSPG is of the view that the new programme should support those objectives. We believe we can help with these objectives as infrastructure sharing may reduce the need for new towers, which in turn reduces the environmental footprint.

Help drive European recovery: We agree that connectivity and technological advance are cornerstones of economic recovery. EWIA and its associated members could be instrumental in executing the Next Generation EU recovery plan by attracting more investments, provide better connectivity and reduce life-cycle costs of infrastructure. Our business model could help strengthen the single market and accelerate the twin green and digital transitions in the wake of the social and economic disruption caused by the corona crisis.