



## Response to the RSPG Draft Opinion ITU-R World Radiocommunication Conference 2023

The European Utilities Telecoms Council (EUTC), representing European electricity and gas generation, transmission and distribution companies welcomes the opportunity to comment on the RSPG's preparations for the World Radiocommunications Conference 2023 (WRC-23).

### Summary

In view of the Climate Emergency, the need to reduce emissions of carbon dioxide (CO<sub>2</sub>) on a global scale, the severe droughts in many parts of Europe and the EU Climate Green Deal, EUTC believes that the RSPG should be urgently calling for an item addressing the need to identify spectrum for 'utility radiocommunications systems' to be added to the draft agenda for the subsequent World Radiocommunications Conference 2027 (WRC-27).

### Detail

Item 10 of the Agenda requires WRC-23:

“to recommend to the Council items for inclusion in the agenda for the next WRC, and items for the preliminary agenda of future conferences, in accordance with Article 7 of the Convention and Resolution 804 (Rev.WRC-19).”

RSPG is already engaged in activity to address the relationship between spectrum policy and climate change, but urgent action is required immediately if these initiatives are to be elevated to a global level because of the 4-year cycle of World Radiocommunications Conferences.

Energy production and use, including the energy used in transport, account for typically 80% of the EU's greenhouse gas emissions. Thus, to tackle climate change effectively, Europe will have to largely 'decarbonise' its energy systems by moving away from fossil fuels. There is now increasing evidence and recognition that digitization of grid management, which is dependent on reliable and often dedicated communication infrastructures which in turn is dependent on the availability of dedicated radio spectrum, assists and accelerates the 'energy transition.'

At a global level, EUTC is an active participant in the 3GPP process developing standards to ensure that the critical elements required by utilities in 5G are incorporated into the standards. However, this participation does not address the core of the problem, that is the lack of dedicated utility radio spectrum.

In addition, EUTC is collaborating with other international utility telecoms associations to promote recognition of the need for access to spectrum for utility operations within the International Telecommunication Union (ITU) Radio Sector (ITU-R) Study Group 5 (WP5A) to develop a report on utility spectrum needs<sup>1</sup>. This work is in parallel with a Report ITU-R SM.2351.1 on Smart Grid Utility Management Systems.<sup>2</sup>

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<sup>1</sup> Annex 18 of Report on the twenty seventh meeting of Working Party 5A <https://www.itu.int/md/R19-WP5A-C-0597/en>

<sup>2</sup> [https://www.itu.int/dms\\_pub/itu-r/opb/rep/R-REP-SM.2351-1-2016-PDF-E.pdf](https://www.itu.int/dms_pub/itu-r/opb/rep/R-REP-SM.2351-1-2016-PDF-E.pdf)

## **Access to radio spectrum**

Utilities must have control over their operational telecoms networks. It is essential for them to be guaranteed access to a small amount of dedicated radio spectrum for these operations.

A minimum allocation of 2 x 3 MHz of spectrum in the 400 MHz region currently being sought by many utilities around Europe is only ½% of the 1,200 MHz of spectrum which was identified for broadband radio services in the 2012 EU Radio Spectrum Policy Programme.<sup>3</sup>

<b>EUTC Spectrum Proposal</b>	
<i>Within Europe, multiple small allocations within harmonised bands:</i>	
LESS INTENSE APPLICATIONS	
• <b>VHF spectrum (50-200 MHz)</b> for resilient voice comms & distribution automation for rural and remote areas. [2 x 1 MHz]	
ANCHOR BAND	
• <b>UHF spectrum (400 MHz bands)</b> for SCADA, automation, smart grids and smart meters. [2 x 3 MHz]	
MORE DENSE APPLICATIONS	
• <b>Lightly regulated or licence-exempt shared spectrum</b> for smart meters and mesh networks. (870-876 MHz)	
• <b>L-band region (1500 MHz)</b> for more data intensive smart grid, security and point-to-multipoint applications. [10 MHz]	
FOUNDATION BANDS	
• <b>Public microwave bands (1500 MHz – 58 GHz)</b> for access to utilities' core fibre networks/strategic resilient back-haul.	
• <b>Public satellite bands</b> to complement terrestrial services for particular applications.	

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## ***The European Utilities Telecom Council (EUTC)***

*The European Utilities Telecom Council (EUTC) is the leading European Utilities trade association dedicated to informing its members and influencing policies on how telecommunication solutions and associated challenges can support the future smart infrastructures and the related policy objectives through the use of innovative technologies, processes, business insights and professional people.*

*This is combined with sharing best practices and learning from across the EUTC and the UTC global organization of telecommunication professionals within the field of utilities and other critical infrastructure environments and associated stakeholders.*

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<sup>3</sup> <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32012D0243>