

European Commission

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Directorate-General for Communications Networks,
Content and Technology



Study on Radio Spectrum Policy Programme: taking stock and discussing future scenarios

Interview Guide

04 May 2023

1. Response form – GENERAL QUESTIONS

This questionnaire is to seek your contribution in the context of a study entitled “Study on Radio Spectrum Policy Programme: taking stock and discussing future scenarios” which is being carried out for the European Commission (DG CNECT) by a consortium led by VVA Brussels, in collaboration with PolicyTracker and LS telcom.

The purpose of the study is to support the preparation of an impact assessment that will accompany a Commission proposal for the revision of the 2012 Radio Spectrum Policy Programme (RSPP) Decision, with a particular focus on the EU sovereignty and the internal market perspective in the management of radio spectrum as well as the efficient use of radio spectrum, including spectrum needs.

The study objectives include a review of the current RSPP Decision, identification of areas for potential revision, identification and description of the problems to be tackled, refining objectives for the EU action, proposal of potential measures and formulation of policy options, an analysis and assessment of the potential impacts of the proposed measures/policy options.

The study in particular requires the contractor to consult stakeholders with an interest, role or expertise in each of the areas addressed by the RSPP Decision. In particular:

- Member State administrations/competent national authorities (including national telecoms regulators);
- Industrial stakeholders, including mobile network operators, broadcasters, industrial users, utilities, SMEs, neutral hosts (third party owners of network infrastructure that rent or lease it to network operators), equipment manufacturers/vendors; their trade associations and institutions;
- Specific experts, including researchers, experts from the academia and think tanks;
- Consumers and their associations.

NOTE: please do not answer in case of insufficient knowledge of the specific matter.

E-mail address

adrian.grilli@eutc.org

Interviewee name

Adrian Grilli

Interviewee organisation

EUTC

Interviewee category

() Member State administrations/competent national authorities

() National telecoms regulators

() Mobile network operators

☐ Broadcasters

☐ Industrial users

☒ Utilities

☐ Small and Medium-sized Enterprises (SMEs)

☐ Neutral hosts (third-party owners of network infrastructure that rent or lease it to network operators)

☐ Equipment manufacturers/vendors

☒ Trade associations and institutions

☐ Researchers

☐ Experts from academia

☐ Experts from think tanks

☐ Consumers

☐ Consumer associations

Date completed

04/05/2023

How familiar are you with the current Radio Spectrum Policy Programme (RSPP)

☒ Very familiar

☐ Reasonably familiar

☐ Little familiarity

☐ I have not heard of it before

☐ Other:

How do you assess the current RSPP Decision and its impact on your industry/sector?

☐ Strong positive

☒ Moderate positive

☐ Weak positive

☐ Moderate negative

☐ Strong negative

☐ Please substantiate your assessment:

The current RSPP specifically refers to spectrum requirements for mission critical sectors, ie Public Safety, Transportation and Utilities (Article 8).

What do you consider to be the most important issues or challenges in view to improve the current RSPP Decision – Where 5 is most important and 1 least important. Mark only one oval per row.

	5	4	3	2	1
The need for additional measures to create a more integrated radio spectrum market in the EU	()	(X)	()	()	()
The need to increase EU sovereignty in decisions concerning spectrum harmonisation	()	()	()	(X)	()
The lack of measures to help Member States suffering radio interference from third states	()	()	(X)	()	()
The need to facilitate the provision of EU-wide satellites services	()	(X)	()	()	()
The need to facilitate other use cases:	()	(X)	()	()	()
vertical use cases	()	(X)	()	()	()
Internet of Things	()	(X)	()	()	()
6G	()	()	()	()	(X)
5G corridors	()	()	()	(X)	()
other	(X)	()	()	()	()
Greater convergence of spectrum authorisation schemes, particularly in regard to 6G	()	()	()	()	(X)
Ensuring that spectrum policy meets the requirements of the Digital Decade policy, in particular connectivity targets	(X)	()	()	()	()

Incentivising the use of mmWave bands for vertical networks	()	()	()	()	(X)
Greater spectrum harmonisation in various sectors, including:	()	(X)	()	()	()
broadcasting	()	()	()	()	()
transport	()	(X)	()	()	()
public safety	()	(X)	()	()	()
utilities	(X)	()	()	()	()
other	()	()	()	()	()
Updating the approach to establishing future spectrum needs	()	()	()	()	()
The need for having quantified spectrum targets	()	()	()	(X)	()
The need for identifying specific bands for 6G	()	()	()	()	(X)
The need for identifying specific bands for 6G by a specific deadline	()	()	()	()	(X)
The need to improve the current RSPP provisions on the inventory so that it will serve more the purpose of measuring the efficiency of use of the bands	()	(X)	()	()	()
Incorporating the European Green Deal policy	(X)	()	()	()	()

Other:

The new RSPP needs to address spectrum for utilities which was identified as a requirement in the 2012 RSPP, but has seen little action in the intervening 11 years.

Please add any comments to the above

What options from the ones listed below would you favour in addressing the challenges you have considered most important in the previous question? The proposed options are grouped into four categories: (i) Security; (ii) Internal market; (iii) Technology and (iv) Other. Security

category is further divided into two subcategories, where the first subcategory consists of three options and the second subcategory of two options. Internal market category consists of three options. Technology category is further divided into two subcategories, consisting of two options each.

Tick all that apply.

SECURITY

() Enhancing EU sovereignty in the management of spectrum by ensuring full control of decision-making in spectrum harmonisation with either:

() **Optional CEPT role + Commission establishing an *ad-hoc* group of national telecoms regulators**

Enhancing EU sovereignty by creation of an ***ad hoc*** body of EU national telecoms regulators, where the Commission would be empowered to exercise a discretion to issue a **mandate** concerning the technical preparatory work for the development of harmonised conditions for the availability and efficient use of radio spectrum either to the European Conference of Postal and Telecommunications Administrations (**CEPT**) or to that ***ad hoc* body**, in cases where essential industrial, technological or economic interests of the Union and/or its Member States may be affected; or

() **Optional CEPT role + Establishing a permanent body of national telecoms regulators**

Enhancing EU sovereignty by creation of a **permanent** body of EU national telecoms regulators, where the Commission would be empowered to exercise a discretion to issue a **mandate** concerning the technical preparatory work for the development of harmonised conditions for the availability and efficient use of radio spectrum either to the **CEPT** or to that **permanent body**, in cases where essential industrial, technological or economic interests of the Union and/or its Member States may be affected; or

() **No role of CEPT + Establishing a permanent body of national telecoms regulators**

Enhancing EU sovereignty by creation of a **permanent** body of EU national telecoms regulators, where the Commission would issue a **mandate** concerning the technical preparatory work for the development of harmonised conditions for the availability and efficient use of radio spectrum to that **permanent body**, in cases where essential industrial, technological or economic interests of the Union and/or its Member States may be affected.

() Ensuring coherent EU response to harmful radio interference from third countries:

() **Reinforced Union support (international bodies, negotiation process at any level)**

Notably, upon the request of that affected Member State(s), **the Union, including the Commission**, would provide assistance in the international bodies (e.g the Union supporting the affected Member State(s) in discussions in the ITU) and during negotiations and discussions at any level (e.g. the Union accompanying the affected Member State(s) in bilateral/multilateral contacts with a third country).

() **Obligation for all Member States to act collectively**

Establishing an **obligation for the Union, including the Commission, and the Member States to act collectively** in order to provide assistance to the affected Member State(s), upon the

request of the affected Member State(s). Member States that could provide assistance on the basis of any legal means available, for example, negotiating frequency coordination agreements or supporting the affected Member State in the international coordination at the ITU level. The Union would be entitled to represent the affected Member State(s) in the discussions and negotiations with a third country.

INTERNAL MARKET

() Additional measures to facilitate EU-wide satellite services with either:

() EU-level selection of satellite operators + national licensing

EU-level selection of satellite operators, pursuant to a joint process managed by the Commission, and under **common criteria, conditions and milestones**. This would also entail an ensuing obligation for Member States to grant the authorisations to use that spectrum according to a **common schedule**; or

() EU-level selection of satellite operators + common format (agreed at EU-level) for national licences

EU-level selection of satellite operators and the requirement for the national licences to comply with a common format agreed at EU level. In addition, Member States would also be required to inform in advance the Commission and other Member States about their plans to notify/register a relevant satellite system at the ITU; or

() Single Union licence

Union licensing scheme for all types of satellite systems, whereby a single licence would be granted by a Union authority which would have to be established. In addition, Member States would also be required to coordinate with the Commission and other Member States their notifications/registrations of relevant satellite systems at the ITU.

TECHNOLOGY

() Ensuring efficient spectrum use:

() Promoting the full range of technological spectrum sharing solutions and flexible authorisation solutions

() An obligation to assess spectrum sharing solutions for each new harmonised band

() Ensuring sufficient spectrum resources with either:

() Establishing priorities for spectrum availability

Cooperation between the Member States and the Commission to identify EU-harmonised spectrum for wireless broadband technologies in support of digital and/or environmental objectives (e.g. 6G, European Green Deal, quantum, space, automated transport, 5G corridors, Internet of Things, Wi-Fi, metaverse, research, etc), or

() Establishing priorities for spectrum availability + determining frequency bands and deadlines

In addition to the cooperation between the Member States and the Commission to assign EU-harmonised spectrum, establishing a spectrum roadmap which identifies frequency bands and sets deadlines to allow the use of those bands

OTHER

() Other:

A robust regime needs to be in place to avoid excessive optimism in terms of demands for spectrum for new innovations and the timescale over which spectrum needs to become available when allocating spectrum for new innovations.

Please add any other comments to the above

2. Response form – SECURITY

Regarding the “Study on Radio Spectrum Policy Programme: taking stock and discussing future scenarios” (previously discussed) this questionnaire seeks your views on the problems related “EU sovereignty in the management of the spectrum”.

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Interviewee name

Adrian Grilli

2.1 Options for addressing EU sovereignty and security issues in spectrum management

Enhancing EU sovereignty in the management of spectrum by ensuring full control of decision-making in spectrum harmonisation

1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators.

Enhancing EU sovereignty by creation of an ad hoc body of EU national telecoms regulators, where the Commission would be empowered to exercise a discretion to issue a mandate concerning the technical preparatory work for the development of harmonised conditions for the availability and efficient use of radio spectrum either to the European Conference of Postal and Telecommunications Administrations (CEPT) or to that ad hoc body, in cases where essential industrial, technological or economic interests of the Union and/or its Member States may be affected;

1B. Optional CEPT role + establishing a permanent body of national telecom regulators.

Enhancing EU sovereignty by creation of a permanent body of EU national telecoms regulators, where the Commission would be empowered to exercise a discretion to issue a mandate concerning the technical preparatory work for the development of harmonised conditions for the availability and

efficient use of radio spectrum to either the CEPT or to that permanent body, in cases where essential industrial, technological or economic interests of the Union and/or its Member States may be affected;

1C. No role of CEPT + establishing a permanent body of national telecom regulators.

Enhancing EU sovereignty by creation of a permanent body of EU national telecoms regulators, where the Commission would issue a mandate concerning the technical preparatory work for the development of harmonised conditions for the availability and efficient use of radio spectrum to that permanent body, in cases where essential industrial, technological or economic interests of the Union and/or its Member States may be affected.

What option(s) from the ones listed above would you favour?

() 1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators.

() 1B. Optional CEPT role + establishing a permanent body of national telecom regulators.

() 1C. No role of CEPT + establishing a permanent body of national telecom regulators.

() Other:

European harmonisation needs to be undertaken in collaboration with CEPT as the EU only represents 27 European states, and without co-operation of all European administrations, coordination and avoidance of interference are impossible to achieve.

In addition, CEPT is the regional representative at the ITU, hence international harmonisation must be undertaken through CEPT.

Add any explanation

Ensuring coherent EU response to harmful radio interference from third countries:

2A. Reinforced Union support (international bodies, negotiation process at any level)

Notably, upon the request of that affected Member State(s), the Union, including the Commission, would provide assistance in the international bodies (e.g the Union supporting the affected Member State(s) in discussions in the ITU) and during negotiations and discussions at any level (e.g. the Union accompanying the affected Member State(s) in bilateral/multilateral contacts with a third country).

2B. Obligation for all Member States to act collectively

Establishing an obligation for the Union, including the Commission, and the Member States to act collectively in order to provide assistance to the affected Member State(s), upon the request of that affected Member State(s). Member States that could provide assistance on the basis of any legal means available, for example, negotiating frequency coordination agreements or supporting the affected Member State in the international coordination at the ITU level. The Union would be entitled to represent the affected Member State(s) in the discussions and negotiations with a third country

What option(s) from the ones listed above would you favour?

() 2A. Reinforced Union support (international bodies, negotiation process at any level)

() 2B. Obligation for all Member States to act collectively

() Other:

Any obligation for all Member States to act collectively will disproportionately affect individual member states.

In addition, EU competency only applies to civil spectrum, and some issues will involve spectrum assigned to military users in other member states.

Add any explanation

2.2 Impacts of the policy options

What are the likely impacts of the policy options?

Impacts of the policy options

	Economic impacts	Social impacts	Environmental impacts
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	()	()	()
1B. Optional CEPT role + Commission establishing a permanent body of national telecom regulators	()	()	()
1C. Optional CEPT role + establishing a permanent body of national telecom regulators	()	()	()
Other	()	()	()
2A. Reinforced Union support (international bodies, negotiation process at any level)	()	()	()
2B. Obligation for all Member States to act collectively	()	()	()
Other	()	()	()

Please add any explanation

2.3 Costs and benefits of the policy options (where possible, please quantify and monetise)

Costs of option 1A: Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators.

- () Increased administrative burden for EU Member States and stakeholders
- () Potential duplication of efforts and overlap with existing regulatory bodies
- () Potential negative impact on diplomatic relations with non-EU countries
- () Potential negative impact on international radio spectrum harmonisation
- () High financial cost for the EU and its Member States
- () Other:

I thought BEREC was already the Group for national telecoms regulators?

Benefits of option 1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators.

- () Increased regulatory consistency and harmonisation across EU Member States
- () Improved accountability and transparency in the telecommunications sector
- () Enhanced EU influence and sovereignty over telecommunications policy
- () Improved coordination and cooperation among EU Member States in dealing with telecommunications issues
- () Other:

I thought BEREC was already the Group for national telecoms regulators?	
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Please explain your choice and, if possible, quantify the costs and benefits; where not possible, please provide a qualitative assessment. Please add any other comments to the costs and benefits above, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed. Please also identify the costs (quantifiable/qualitative) of not acting, i.e. if the proposed policy option is not followed.

We already have BEREC and RSPG: why do we need yet another group of Regulators?	
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Costs of option 1B: Optional CEPT role + establishing a permanent body of national telecom regulators.

- () Increased administrative burden for EU Member States and stakeholders
- () Potential duplication of efforts and overlap with existing regulatory bodies
- () Potential negative impact on diplomatic relations with non-EU countries
- () Potential negative impact on international radio spectrum harmonisation

() High financial cost for the EU and its Member States

() Other:

Benefits of option 1B. Optional CEPT role + establishing a permanent body of national telecom regulators.

() Increased regulatory consistency and harmonisation across EU Member States

() Improved accountability and transparency in the telecommunications sector

() Enhanced EU influence and sovereignty over telecommunications policy

() Improved coordination and cooperation among EU Member States in dealing with telecommunications issues

Other:

Please explain your choice and, if possible, quantify the costs and benefits; where not possible, please provide a qualitative assessment. Please add any other comments to the costs and benefits above, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed. Please also identify the costs (quantifiable/qualitative) of not acting, i.e. if the proposed policy option is not followed.

Costs of option 1C: No role of CEPT + establishing a permanent body of national telecom regulators.

() Increased administrative burden for EU Member States and stakeholders

() Potential duplication of efforts and overlap with existing regulatory bodies

() Potential negative impact on diplomatic relations with non-EU countries

() Potential negative impact on international radio spectrum harmonisation

() High financial cost for the EU and its Member States

() Other:

Benefits of option 1C. No role of CEPT + establishing a permanent body of national telecom regulators.

() Increased regulatory consistency and harmonisation across EU Member States

() Improved accountability and transparency in the telecommunications sector

() Enhanced EU influence and sovereignty over telecommunications policy

() Improved coordination and cooperation among EU Member States in dealing with telecommunications issues

() Other:

Please explain your choice and, if possible, quantify the costs and benefits; where not possible, please provide a qualitative assessment. Please add any other comments to the costs and benefits above, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed. Please also identify the costs (quantifiable/qualitative) of not acting, i.e. if the proposed policy option is not followed.

If the interviewee has proposed other policy options, please quantify, if possible, the costs and benefits of the proposed policy option(s); where not possible, please provide a qualitative assessment. Please assess their impact in text below, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed.

Costs of option 2A: Reinforced Union support (international bodies, negotiation process at any level)

() Increased administrative burden for EU Member States and stakeholders

() Potential duplication of efforts and overlap with existing processes

() Potential negative impact on diplomatic relations with non-EU countries

() High financial cost for the EU and its Member States

Benefits of option 2A. Reinforced Union support (international bodies, negotiation process at any level)

() Increased regulatory consistency and harmonisation across EU Member States

() Improved accountability and transparency in the spectrum sector

() Enhanced EU influence and sovereignty over spectrum policy

() Improved coordination and cooperation among EU Member States in dealing with spectrum issues

() Other:

Please explain your choice and, if possible, quantify the costs and benefits; where not possible, please provide a qualitative assessment. Please add any other comments to the costs and benefits above, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed. Please also identify the costs (quantifiable/qualitative) of not acting, i.e. if the proposed policy option is not followed.

Costs of option 2B. Obligation for all Member States to act collectively

- () Increased administrative burden for EU Member States and stakeholders
- () Potential duplication of efforts and overlap with existing processes
- () Potential negative impact on diplomatic relations with non-EU countries
- () High financial cost for the EU and its Member States
- () Other:

Benefits of option 2B. Obligation for all Member States to act collectively

- () Increased regulatory consistency and harmonisation across EU Member States
- () Improved accountability and transparency in the spectrum sector
- () Enhanced EU influence and sovereignty over spectrum policy
- () Improved coordination and cooperation among EU Member States in dealing with spectrum issues
- () Other:

Please explain your choice and, if possible, quantify the costs and benefits; where not possible, please provide a qualitative assessment. Please add any other comments to the costs and benefits above, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed. Please also identify the costs (quantifiable/qualitative) of not acting, i.e. if the proposed policy option is not followed.

If the interviewee has proposed other policy options, please quantify, if possible, the costs and benefits of the proposed policy option(s); where not possible, please provide a qualitative assessment. Please assess their impact in text below, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed.

2.4 Other impacts of the policy options

How will the policy option(s) impact the 'do no significant harm' principle? (This aims to minimize negative impacts on people and the environment, e.g. human health, social and economic equity, and environmental sustainability). Mark only one oval per row.

	Conforms with 'do no significant harm' principle	Partially conforms with 'do no significant harm' principle	Does not conform with 'do no significant harm' principle
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	()	()	()
1B. Optional CEPT role + establishing a permanent body of national telecom regulators	()	()	()
1C. No role of CEPT + establishing a permanent body of national telecom regulators.	()	()	()
Other	()	()	()
2A. Reinforced Union support (international bodies, negotiation process at any level)	()	()	()
2B. Obligation for all Member States to act collectively	()	()	()
Other	()	()	()

Please add any explanation for answer above

How will the policy option(s) impact the 'digital by default principle'? This means that digital channels, such as websites and apps, should be the default option for accessing government services, unless there is a specific reason why not. (NB it seems to us that any measure to improve spectrum access improves digitisation therefore conforms to the principle). Mark only one oval per row.

	Conforms with 'digital by default' principle	Partially conforms with 'digital by default' principle	Does not conform with 'digital by default' principle
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	()	()	()
1B. Optional CEPT role + establishing a permanent body of national telecom regulators	()	()	()

Please add any explanation for answer above

How will the policy option(s) impact the EU territories and regions (e.g. equitable treatment of urban and rural; cross-border issues)? Mark only one oval per row.

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	()	()	()	()	()	()	()
1B. Optional CEPT role + establishing a permanent body of national telecom regulators	()	()	()	()	()	()	()
1C. No role of CEPT + establishing a permanent body of national telecom regulators.	()	()	()	()	()	()	()
Other	()	()	()	()	()	()	()
2A. Reinforced Union support	()	()	()	()	()	()	()

Please add any explanation for answer above

How will the policy option(s) impact the coordination with non-EU countries? Mark only one oval per row.

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	()	()	()	()	()	()	()
1B. Optional CEPT role + establishing a permanent body of national telecom regulators	()	()	()	()	()	()	()
1C. No role of CEPT + establishing a permanent body of national telecom regulators.	()	()	()	()	()	()	()
Other	()	()	()	()	()	()	()
2A. Reinforced Union support (international bodies, negotiation	()	()	()	()	()	()	()

2B. Obligation for all Member States to act collectively	()	()	()	()	()	()	()
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Other	()	()	()	()	()	()	()
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Please add any explanation for answer above

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How will the policy option(s) impact the internal market? Mark only one oval per row.

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	()	()	()	()	()	()	()
1B. Optional CEPT role + establishing a permanent body of national telecom regulators	()	()	()	()	()	()	()
1C. No role of CEPT + establishing a permanent body of national telecom regulators.	()	()	()	()	()	()	()
Other	()	()	()	()	()	()	()
2A. Reinforced Union support (international bodies, negotiation process at any level)	()	()	()	()	()	()	()
2B. Obligation for all Member States to act collectively	()	()	()	()	()	()	()

Other () () () () () ()

Please add any explanation for answer above

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How will the policy option(s) impact the SMEs? Mark only one oval per row.

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	()	()	()	()	()	()	()
1B. Optional CEPT role + establishing a permanent body of national telecom regulators	()	()	()	()	()	()	()
1C. No role of CEPT + establishing a permanent body of national telecom regulators.	()	()	()	()	()	()	()
Other	()	()	()	()	()	()	()
2A. Reinforced Union support (international bodies, negotiation process at any level)	()	()	()	()	()	()	()
2B. Obligation for all Member States to act collectively	()	()	()	()	()	()	()
Other	()	()	()	()	()	()	()

Please add any explanation for answer above

How will the policy option(s) impact competition? Mark only one oval per row.

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
1B. Optional CEPT role + establishing a permanent body of national telecom regulators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
1C. No role of CEPT + establishing a permanent body of national telecom regulators.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2A. Reinforced Union support (international bodies, negotiation process at any level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2B. Obligation for all Member States to act collectively	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

How will the policy option(s) impact fundamental rights and equality (including gender) in particular?
Mark only one oval per row.

Please add any explanation for answer above

How will the policy option(s) impact consumers? Mark only one oval per row.

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
1A. Optional CEPT role +	()	()	()	()	()	()	()

Commission
establishing an
ad hoc group
of national
telecom
regulators

1B. Optional CEPT role + establishing a permanent body of national telecom regulators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
1C. No role of CEPT + establishing a permanent body of national telecom regulators.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2A. Reinforced Union support (international bodies, negotiation process at any level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2B. Obligation for all Member States to act collectively	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

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2.5 Comparison of policy options

Assess each policy option in terms of its effectiveness (the extent to which it would achieve the objective) - Where 5 is highly effective and 1 is ineffective. Mark only one oval per row.

	5	4	3	2	1
1A. Optional CEPT role + Commission establishing an ad	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

hoc group of
national telecom
regulators

1B. Optional CEPT role + establishing a permanent body of national telecom regulators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
1C. No role of CEPT + establishing a permanent body of national telecom regulators.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
2A. Reinforced Union support (international bodies, negotiation process at any level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2B. Obligation for all Member States to act collectively	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

--

Assess each policy option in terms of its feasibility – Where 5 is very feasible and 1 is not feasible.
Mark only one oval per row.

	5	4	3	2	1
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
1B. Optional CEPT role + establishing a permanent body of national telecom regulators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
1C. No role of CEPT + establishing a permanent body of national telecom regulators.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

2A. Reinforced Union support (international bodies, negotiation process at any level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2B. Obligation for all Member States to act collectively	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

Assess each policy option in terms of its efficiency (respective key economic, social and environmental impacts and benefit/cost ratio, cost-effectiveness) – Where 5 is very efficient and 1 is inefficient. Mark only one oval per row.

	5	4	3	2	1
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
1B. Optional CEPT role + establishing a permanent body of national telecom regulators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
1C. No role of CEPT + establishing a permanent body of national telecom regulators.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
2A. Reinforced Union support (international bodies, negotiation process at any level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2B. Obligation for all Member States to act collectively	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

Assess each policy option in terms of its coherence with other EU policy objectives, including the Charter for fundamental rights, and with other policy initiatives and instruments – Where 5 is very coherent and 1 is not coherent. Mark only one oval per row.

	5	4	3	2	1
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	()	()	()	()	()
1B. Optional CEPT role + establishing a permanent body of national telecom regulators	()	()	()	()	()
1C. No role of CEPT + establishing a permanent body of national telecom regulators.	()	()	()	()	()
Other	()	()	()		
2A. Reinforced Union support (international bodies, negotiation process at any level)	()	()	()	()	()
2B. Obligation for all Member States to act collectively	()	()	()	()	()
Other	()	()	()	()	()

Please add any explanation for answer above

Assess each policy option in terms of its future-proofing (the extent to which a policy option takes into account potential future developments and challenges, in order to ensure its continued effectiveness over time) – Where 5 is very future-proof and 1 is not future-proof. Mark only one oval per row.

	5	4	3	2	1
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	()	()	()	()	()

1B. Optional CEPT role + establishing a permanent body of national telecom regulators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
1C. No role of CEPT + establishing a permanent body of national telecom regulators.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
2A. Reinforced Union support (international bodies, negotiation process at any level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2B. Obligation for all Member States to act collectively	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

Assess each policy option in terms of its coherence with European Climate Law and its binding legal framework and targets for reducing greenhouse gas emissions in the EU, how it addresses the challenge of climate change – Where 5 is very coherent and 1 is not coherent. Mark only one oval per row.

	5	4	3	2	1
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
1B. Optional CEPT role + establishing a permanent body of national telecom regulators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
1C. No role of CEPT + establishing a permanent body of national telecom regulators.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
2A. Reinforced Union support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(international
bodies, negotiation
process at any level)

2B. Obligation for all Member States to act collectively	()	()	()	()	()
Other	()	()	()	()	()

Please add any explanation for answer above

Is the policy option in proportion to the problem it is trying to solve – Where 5 is very proportionate and 1 is disproportionate. Mark only one oval per row.

	5	4	3	2	1
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	()	()	()	()	()
1B. Optional CEPT role + establishing a permanent body of national telecom regulators	()	()	()	()	()
1C. No role of CEPT + establishing a permanent body of national telecom regulators.	()	()	()	()	()
Other	()	()	()		
2A. Reinforced Union support (international bodies, negotiation process at any level)	()	()	()	()	()
2B. Obligation for all Member States to act collectively	()	()	()	()	()
Other	()	()	()	()	()

Please add any explanation for answer above

2.6 Preferred policy option(s)

Preferred policy option(s)

() 1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators.

() 1B. Optional CEPT role + establishing a permanent body of national telecom regulators.

() 1C. No role of CEPT + establishing a permanent body of national telecom regulators.

() Other:

Please add explanation for your preferred policy option(s)

Preferred policy option(s)

() 2A. Reinforced Union support (international bodies, negotiation process at any level)

() 2B. Obligation for all Member States to act collectively

() Other:

Please add explanation for your preferred policy option(s)

2.7 REFIT

The European Commission's regulatory fitness and performance programme (REFIT) aims to ensure that EU laws deliver on their objectives at a minimum cost for the benefit of citizens and businesses.

Under this programme, the Commission ensures that EU laws deliver their intended benefits for individuals and businesses, while simplifying existing EU laws and cutting red tape, whenever possible. The programme aims to make EU laws simpler, more targeted and easier to comply with.

What concerns, if any, do you have about the REFIT process?

2.8 Monitoring and evaluation

In the boxes below please indicate how actual impacts of the preferred policy option(s) should be monitored and evaluated; AND what indicators or metrics would be useful for assessing their success.

1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators.

1B. Optional CEPT role + establishing a permanent body of national telecom regulators.

1C. No role of CEPT + establishing a permanent body of national telecom regulators.

2A. Reinforced Union support (international bodies, negotiation process at any level)

2B. Obligation for all Member States to act collectively

Other

2.9 Who is affected and how (applicable to policy options 1A, 1B and 1C)

Can you provide any estimates - preferably financial - or examples of the costs and benefits of your preferred policy option(s) for your industry/sector?

What stakeholder group(s) will be the main recipients of the benefits and/or the main bearers of the costs?

Are there any potential trade-offs or unintended consequences of the preferred policy option(s) that the stakeholder believes need to be considered?

2.11 What Sustainable Development Goals do you believe the preferred policy option(s) will contribute to? (Tick box to indicate contribution)

- ☐ No poverty
- ☐ Zero hunger
- ☐ Good Health and Well-being
- ☐ Quality Education
- ☐ Gender Equality
- ☐ Clean Water and Sanitation
- ☐ Affordable and Clean Energy
- ☐ Industry, Innovation and Infrastructure

- ☐ Reduced Inequality
- ☐ Sustainable Cities and Communities
- ☐ Responsible Consumption and Production
- ☐ Climate Action
- ☐ Life Below Water (sustainable use of oceans)
- ☐ Life on Land (sustainable use of land resources)
- ☐ Peace and Justice, Strong Institutions (rule of law, human rights, inclusive societies)
- ☐ Partnerships to achieve the Goal (international support to prevent climate change)
- ☐ Other:

Provide brief explanation of choices above

Provide any specific examples of how the preferred policy option(s) will contribute to these goals

2.10 Who is affected and how (applicable to policy options 2A and 2B)

Can you provide any estimates - preferably financial - or examples of the costs and benefits of your preferred policy option(s) for your industry/sector?

What stakeholder group(s) will be the main recipients of the benefits and/or the main bearers of the costs?

Are there any potential trade-offs or unintended consequences of the preferred policy option(s) that the stakeholder believes need to be considered?

2.11 What Sustainable Development Goals do you believe the preferred policy option(s) will contribute to? (Tick box to indicate contribution)

- ☐ No poverty
- ☐ Zero hunger
- ☐ Good Health and Well-being
- ☐ Quality Education

- () Gender Equality
- () Clean Water and Sanitation
- () Affordable and Clean Energy
- () Industry, Innovation and Infrastructure
- () Reduced Inequality
- () Sustainable Cities and Communities
- () Responsible Consumption and Production
- () Climate Action
- () Life Below Water (sustainable use of oceans)
- () Life on Land (sustainable use of land resources)
- () Peace and Justice, Strong Institutions (rule of law, human rights, inclusive societies)
- () Partnerships to achieve the Goal (international support to prevent climate change)
- () Other:

Provide brief explanation of choices above

Provide any specific examples of how the preferred policy option(s) will contribute to these goals

2.11 Competitiveness check

What impacts will the envisaged revision of the RSPP Decision have on their industry/sector's cost and price competitiveness? Mark only one oval per row

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	()	()	()	()	()	()	()
1B. Optional CEPT role +	()	()	()	()	()	()	()

permanent
body of
national
telecom
regulators

1C. No role of CEPT + establishing a permanent body of national telecom regulators.	()	()	()	()	()	()	()
---	-----	-----	-----	-----	-----	-----	-----

Other	()	()	()	()	()	()	()
-------	-----	-----	-----	-----	-----	-----	-----

2A. Reinforced Union support (international bodies, negotiation process at any level)	()	()	()	()	()	()	()
---	-----	-----	-----	-----	-----	-----	-----

2B. Obligation for all Member States to act collectively	()	()	()	()	()	()	()
--	-----	-----	-----	-----	-----	-----	-----

Other	()	()	()	()	()	()	()
-------	-----	-----	-----	-----	-----	-----	-----

Provide brief explanation of choices above

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What impacts will the envisaged revision of the RSPD Decision have on their industry/sector's innovative competitiveness (capacity to innovate)? Mark only one oval per row.

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
1A. Optional CEPT role + Commission establishing an ad hoc group of national telecom regulators	()	()	()	()	()	()	()
1B. Optional CEPT role + establishing a permanent	()	()	()	()	()	()	()

national
telecom
regulators

1C. No role of CEPT + establishing a permanent body of national telecom regulators.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2A. Reinforced Union support (international bodies, negotiation process at any level)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2B. Obligation for all Member States to act collectively	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Provide brief explanation of choices above

3. Response form – INTERNAL MARKET

Regarding the “Study on Radio Spectrum Policy Programme: taking stock and discussing future scenarios” (previously discussed) this questionnaire seeks your views on the problems related the “fragmentation of the internal market”.

E-mail address

Adrian.Grilli@EUTC.org

Interviewee name

Adrian Grilli

3.1 Options for addressing EU internal market issues in spectrum management

Additional measures to facilitate EU-wide satellite services

3A. EU-level selection of satellite operators + national licensing

EU-level selection of satellite operators, pursuant to a joint process managed by the Commission, and under common criteria, conditions and milestones. This would also entail an ensuing obligation for Member States to grant the authorisations to use that spectrum according to a common schedule.

3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences

EU-level selection of satellite operators and the requirement for the national licences to comply with a common format agreed at EU level. In addition, Member States would also be required to inform in advance the Commission and other Member States about their plans to notify/register a relevant satellite system at the ITU.

3C. Single Union licence

Union licensing scheme for all types of satellite systems, whereby a single licence would be granted by a Union authority which would have to be established. In addition, Member States would also be required to coordinate with the Commission and other Member States their notifications/registrations of relevant satellite systems at the ITU.

What option(s) from the ones listed above would you favour?

☐ 3A. EU-level selection of satellite operators + national licensing

☐ 3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences

☐ 3C. Single Union licence

☐ Other:

Add any explanation

EUTC members would have to consider these measures carefully. The satellite market is currently in the midst of significant change, and the way in which these innovations might develop is still unclear. EUTC Members have over recent years often seen their current systems evicted from spectrum to accommodate new services which have failed to succeed in the way envisaged. SDL in L-Band where utilities had many fixed links, and similarly in the 26 GHz band. We also see the 1900-1920 MHz band auctioned to mobile operators around year 2000 has been left unused for over 20 years now. Looking at previous experience in the satellite market, some of these new services will not survive: any action which prejudices the interests of existing critical users for the benefit of yet unproven services, often promoted from outside the EU may not be in the best interests of European citizens and consumers.

If satellite operators are operating services in competition with terrestrial users and operators, how will spectrum be charged for to ensure a level playing field with terrestrial services?

3.2 Impacts of the policy options

What are the likely impacts of the policy options?

Impacts of the policy options

	Economic impacts	Social impacts	Environmental impacts
3A. EU-level selection of satellite operators + national licensing	()	()	()
3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	()	()	()
3C. Single Union licence	()	()	()
Other	()	()	()

Add any explanation

3.3 Costs and benefits of the policy options (where possible, please quantify and monetise)

Costs of option 3A. EU-level selection of satellite operators + national licensing

- () Potential negative impact on existing satellite operators and industries
- () High financial cost for the EU and its Member States
- () Increased administrative burden for EU Member States and stakeholders
- () Uncertainty regarding the effectiveness of the proposed additional measures
- () Other:

Benefits of option 3A. EU-level selection of satellite operators + national licensing

- () Improved access to satellite services for EU Member States, businesses and citizens
- () Enhanced EU influence and visibility on the international stage
- () Improved coordination and cooperation among EU Member States in dealing with satellite issues
- () Potential for increased economic growth in the EU satellite sector
- () Reduced financial cost for EU Member States and stakeholders
- () Reduced administrative burden for EU Member States and stakeholders
- () Other:

Please explain your choice and, if possible, quantify the costs and benefits; where not possible, please provide a qualitative assessment. Please add any other comments to the costs and benefits above, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed. Please also identify the costs (quantifiable/qualitative) of not acting, i.e. if the proposed policy option is not followed.

Costs of option 3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences

- ☐ Potential negative impact on existing satellite operators and industries
- ☐ High financial cost for the EU and its Member States
- ☐ Increased administrative burden for EU Member States and stakeholders
- ☐ Uncertainty regarding the effectiveness of the proposed additional measures
- ☐ Other:

Benefits of option 3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences

- ☐ Improved access to satellite services for EU Member States, businesses and citizens
- ☐ Enhanced EU influence and visibility on the international stage
- ☐ Improved coordination and cooperation among EU Member States in dealing with satellite issues
- ☐ Potential for increased economic growth in the EU satellite sector
- ☐ Reduced financial cost for EU Member States and stakeholders
- ☐ Reduced administrative burden for EU Member States and stakeholders
- ☐ Other:

Please explain your choice and, if possible, quantify the costs and benefits; where not possible, please provide a qualitative assessment. Please add any other comments to the costs and benefits above, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed. Please also identify the costs (quantifiable/qualitative) of not acting, i.e. if the proposed policy option is not followed.

Costs of option 3C. Single Union licence

- ☐ Potential negative impact on existing satellite operators and industries
- ☐ High financial cost for the EU and its Member States

- () Increased administrative burden for EU Member States and stakeholders
- () Uncertainty regarding the effectiveness of the proposed additional measures
- () Other:

Benefits of option 3C. Single Union licence

- () Improved access to satellite services for EU Member States, businesses and citizens
- () Enhanced EU influence and visibility on the international stage
- () Improved coordination and cooperation among EU Member States in dealing with satellite issues
- () Potential for increased economic growth in the EU satellite sector
- () Reduced financial cost for EU Member States and stakeholders
- () Reduced administrative burden for EU Member States and stakeholders
- () Other:

Please explain your choice and, if possible, quantify the costs and benefits; where not possible, please provide a qualitative assessment. Please add any other comments to the costs and benefits above, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed. Please also identify the costs (quantifiable/qualitative) of not acting, i.e. if the proposed policy option is not followed.

If the interviewee has proposed other policy options, please quantify, if possible, the costs and benefits of the proposed policy option(s); where not possible, please provide a qualitative assessment. Please assess their impact in text below, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed.

3.4 Other impacts of the policy options

How will the policy option(s) impact the 'do no significant harm' principle? (This aims to minimize negative impacts on people and the environment, e.g. human health, social and economic equity, and environmental sustainability). Mark only one oval per row.

Conforms with 'do no
significant harm'
principle

Partially conforms
with 'do no
significant harm'
principle

Does not conform
with 'do no
significant harm'
principle

Please add any explanation for answer above

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
3A. EU-level selection of satellite operators + national licensing	()	()	()	()	()	()	()
3B. EU-level selection of	()	()	()	()	()	()	()

satellite
operators +
common
format
(agreed at
EU-level) for
national
licences

3C. Single Union licence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

How will the policy option(s) impact the coordination with non-EU countries? Mark only one oval per row.

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
3A. EU-level selection of satellite operators + national licensing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3C. Single Union licence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

How will the policy option(s) impact the essential security interests of the EU? Mark only one oval per row.

Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
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3A. EU-level selection of satellite operators + national licensing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3C. Single Union licence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

How will the policy option(s) impact the internal market? Mark only one oval per row.

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
3A. EU-level selection of satellite operators + national licensing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3C. Single Union licence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
3A. EU-level selection of satellite operators + national licensing	()	()	()	()	()	()	()
3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	()	()	()	()	()	()	()
3C. Single Union licence	()	()	()	()	()	()	()
Other	()	()	()	()	()	()	()

--

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
3A. EU-level selection of satellite operators + national licensing	()	()	()	()	()	()	()
3B. EU-level selection of satellite operators + common format (agreed at EU-level) for	()	()	()	()	()	()	()

3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
--	-----------------------	-----------------------	-----------------------	-----------------------	-----------------------	-----------------------	-----------------------

3C. Single Union licence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
--------------------------	-----------------------	-----------------------	-----------------------	-----------------------	-----------------------	-----------------------	-----------------------

Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Please add any explanation for answer above

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3.5 Comparison of policy options

Assess each policy option in terms of its effectiveness (the extent to which it would achieve the objective) - Where 5 is highly effective and 1 is ineffective. Mark only one oval per row.

	5	4	3	2	1
3A. EU-level selection of satellite operators + national licensing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3C. Single Union licence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

--

Assess each policy option in terms of its feasibility – Where 5 is very feasible and 1 is not feasible. Mark only one oval per row.

	5	4	3	2	1
3A. EU-level selection of satellite	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

operators + national
licensing

3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3C. Single Union licence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

Assess each policy option in terms of its efficiency (respective key economic, social and environmental impacts and benefit/cost ratio, cost-effectiveness) – Where 5 is very efficient and 1 is inefficient. Mark only one oval per row.

	5	4	3	2	1
3A. EU-level selection of satellite operators + national licensing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3C. Single Union licence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

Assess each policy option in terms of its coherence with other EU policy objectives, including the Charter for fundamental rights, and with other policy initiatives and instruments – Where 5 is very coherent and 1 is not coherent. Mark only one oval per row.

	5	4	3	2	1
3A. EU-level selection of satellite operators + national licensing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
--	-----------------------	-----------------------	-----------------------	-----------------------	-----------------------

3C. Single Union licence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

Assess each policy option in terms of its future-proofing (the extent to which a policy option takes into account potential future developments and challenges, in order to ensure its continued effectiveness over time) – Where 5 is very future-proof and 1 is not future-proof. Mark only one oval per row.

	5	4	3	2	1
3A. EU-level selection of satellite operators + national licensing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3C. Single Union licence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

Assess each policy option in terms of its coherence with European Climate Law and its binding legal framework and targets for reducing greenhouse gas emissions in the EU, how it addresses the challenge of climate change – Where 5 is very coherent and 1 is not coherent. Mark only one oval per row.

	5	4	3	2	1
3A. EU-level selection of satellite operators + national licensing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3C. Single Union licence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

Is the policy option in proportion to the problem it is trying to solve – Where 5 is very proportionate and 1 is disproportionate. Mark only one oval per row.

	5	4	3	2	1
3A. EU-level selection of satellite operators + national licensing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3C. Single Union licence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

3.6 Preferred policy option(s)

Preferred policy option(s)

☐ 3A. EU-level selection of satellite operators + national licensing

☐ 3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences

☐ 3C. Single Union licence

☐ Other:

Please add explanation for your preferred policy option(s)

3.7 REFIT

The European Commission's regulatory fitness and performance programme (REFIT) aims to ensure that EU laws deliver on their objectives at a minimum cost for the benefit of citizens and businesses.

Under this programme, the Commission ensures that EU laws deliver their intended benefits for individuals and businesses, while simplifying existing EU laws and cutting red tape, whenever possible. The programme aims to make EU laws simpler, more targeted and easier to comply with.

What concerns, if any, do you have about the REFIT process?

3.8 Monitoring and evaluation

In the boxes below please indicate how actual impacts of the preferred policy option(s) should be monitored and evaluated; AND what indicators or metrics would be useful for assessing their success.

3A. EU-level selection of satellite operators + national licensing

3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences

3C. Single Union licence

Other

3.9 Who is affected and how

Can you provide any estimates - preferably financial - or examples of the costs and benefits of your preferred policy option(s) for your industry/sector?

What stakeholder group(s) will be the main recipients of the benefits and/or the main bearers of the costs?

Are there any potential trade-offs or unintended consequences of the preferred policy option(s) that the stakeholder believes need to be considered?

2.11 What Sustainable Development Goals do you believe the preferred policy option(s) will contribute to? (Tick box to indicate contribution)

- ☐ No poverty
- ☐ Zero hunger
- ☐ Good Health and Well-being
- ☐ Quality Education
- ☐ Gender Equality
- ☐ Clean Water and Sanitation
- ☐ Affordable and Clean Energy
- ☐ Industry, Innovation and Infrastructure
- ☐ Reduced Inequality
- ☐ Sustainable Cities and Communities
- ☐ Responsible Consumption and Production
- ☐ Climate Action
- ☐ Life Below Water (sustainable use of oceans)
- ☐ Life on Land (sustainable use of land resources)
- ☐ Peace and Justice, Strong Institutions (rule of law, human rights, inclusive societies)
- ☐ Partnerships to achieve the Goal (international support to prevent climate change)
- ☐ Other:

Provide brief explanation of choices above

Provide any specific examples of how the preferred policy option(s) will contribute to these goals

3.10 Competitiveness check

What impacts will the envisaged revision of the RSPP Decision have on their industry/sector's cost and price competitiveness? Mark only one oval per row

Provide brief explanation of choices above

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
3A. EU-level selection of satellite operators + national licensing	()	()	()	()	()	()	()
3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	()	()	()	()	()	()	()
3C. Single Union licence	()	()	()	()	()	()	()

Other () () () () () ()

Provide brief explanation of choices above

--

What impacts will the envisaged revision of the RSPP Decision have on their industry/sector's innovative competitiveness (capacity to innovate)? Mark only one oval per row.

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
3A. EU-level selection of satellite operators + national licensing	()	()	()	()	()	()	()
3B. EU-level selection of satellite operators + common format (agreed at EU-level) for national licences	()	()	()	()	()	()	()
3C. Single Union licence	()	()	()	()	()	()	()
Other	()	()	()	()	()	()	()

Provide brief explanation of choices above

--

What impacts will the envisaged revision of the RSPP Decision have on SME competitiveness? Mark only one oval per row.

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
3A. EU-level selection of satellite operators + national licensing	()	()	()	()	()	()	()
3B. EU-level selection of satellite	()	()	()	()	()	()	()

operators +
common
format
(agreed at
EU-level) for
national
licences

3C. Single Union licence	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Provide brief explanation of choices above

4. Response form – TECHNOLOGY

Regarding the “Study on Radio Spectrum Policy Programme: taking stock and discussing future scenarios” (previously discussed) this questionnaire seeks your views on the problems related to the “outdated EU-level spectrum policy not fit for the digital decade”.

E-mail address

Adrian.Grilli@EUTC.org

Interviewee name

Adrian Grilli

4.1 Policy options regarding technological issues in the EU

Ensuring efficient spectrum use:

4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions

Reinforcing the principle of spectrum sharing and flexible licensing to become mainstream

4B. An obligation to assess spectrum sharing solutions for each new harmonised band

Establishing an obligation to assess spectrum sharing option for each new harmonised band

What option(s) from the ones listed above would you favour?

☐ 4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions

☐ 4B. An obligation to assess spectrum sharing solutions for each new harmonised band

☒ Other:

Flexible licensing solution should allow end users to hold spectrum licenses without adverse conditions where appropriate. Currently, some spectrum is unused or poorly used because

regulators insist on the licence being held by a telco for philosophical reasons, irrespective of the demonstrable benefits of private spectrum operations.

With due respect to regulatory authorities, there is sometimes a tendency to ignore the concept of 'evidence-based regulation'. The allocation of the 26 GHz band to 5G is an example of the forced migration of existing users out of a band with little evidence of a demand for spectrum in that band.

Add any explanation

Utilities have no problem with an obligation to assess spectrum sharing solutions for each new harmonised band, provided that it is implemented with technical rigour. For example:

- o Where a utility is permanently deploying a service 24/7/365 requiring 99.999% availability, 6ms maximum latency and 400us maximum asymmetry (as required for category 1 teleprotection services), sharing with other users in the same geography is almost impossible.
- o Geographic sharing can sometimes be accommodated with utilities or railways and other services, but often the costs of technical coordination prevent successful implementation.

Ensuring sufficient spectrum resources:

5A. Establishing priorities for spectrum availability

Cooperation between the Member States and the Commission to identify EU-harmonised spectrum for wireless broadband technologies in support of digital and/or environmental objectives (e.g. 6G, European Green Deal, quantum, space, automated transport, 5G corridors, Internet of Things, Wi-Fi, metaverse, research, etc)

5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines

In addition to the cooperation between the Member States and the Commission to assign EU-harmonised spectrum, establishing a spectrum roadmap which identifies frequency bands and sets deadlines to allow the use of those bands.

What option(s) from the ones listed above would you favour?

() 5A. Establishing priorities for spectrum availability

() 5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines

(X) Other:

EUTC favours approach 5A, but the policy areas are extremely diverse. Areas such as environmental objectives and the European Green Deal are immediate and pressing: quantum and the metaverse are still ideological concepts.

Add any explanation

4.2 Impacts of the policy options

What are the likely impacts of the policy options?

Impacts of the policy options

	Economic impacts	Social impacts	Environmental impacts
4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions	()	()	()
4B. An obligation to assess spectrum sharing solutions for each new harmonised band	()	()	()
Other	()	()	()
5A. Establishing priorities for spectrum availability	()	()	()
5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines	()	()	()
Other	()	()	()

Add any explanation

--

4.3 Costs and benefits of the policy options (where possible, please quantify and monetise)

Costs of option 4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions

- () Potential negative impact on existing spectrum users and industries
- () Increased administrative burden for EU Member States and stakeholders
- () Uncertainty regarding the effectiveness of the proposed spectrum sharing solutions
- () Uncertainty regarding the effectiveness of the proposed flexible licensing solutions
- () High financial cost for the EU and its Member States
- () Other:

--

Benefits of option 4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions

- () Improved spectrum efficiency and utilization

- () Increased access to spectrum for EU Member States, businesses and citizens
- () Enhanced innovation and technological development in the telecommunications sector
- () Improved coordination and cooperation among EU Member States in dealing with spectrum issues
- () Potential for increased economic growth in the EU telecommunications sector
- () Other:

Please explain your choice and, if possible, quantify the costs and benefits; where not possible, please provide a qualitative assessment. Please add any other comments to the costs and benefits above, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed. Please also identify the costs (quantifiable/qualitative) of not acting, i.e. if the proposed policy option is not followed.

Costs of option 4B. An obligation to assess spectrum sharing solutions for each new harmonised band

- () Increased administrative burden for EU Member States and stakeholders
- () Potential delay in the rollout of new harmonized bands due to the assessment process
- () Uncertainty regarding the effectiveness of the proposed spectrum sharing solutions
- () High financial cost for the EU and its Member States
- () Other:

Benefits of option 4B. An obligation to assess spectrum sharing solutions for each new harmonised band

- () Improved spectrum efficiency and utilization
- () Increased access to spectrum for EU Member States, businesses and citizens
- () Enhanced innovation and technological development in the telecommunications sector
- () Improved coordination and cooperation among EU Member States in dealing with spectrum issues
- () Potential for increased economic growth in the EU telecommunications sector
- () Other:

Please explain your choice and, if possible, quantify the costs and benefits; where not possible, please provide a qualitative assessment. Please add any other comments to the costs and benefits above, including the practical impact on their own sector; whether other stakeholders

will be affected; and any specific issues which must be addressed. Please also identify the costs (quantifiable/qualitative) of not acting, i.e. if the proposed policy option is not followed.

If the interviewee has proposed other policy options, please quantify, if possible, the costs and benefits of the proposed policy option(s); where not possible, please provide a qualitative assessment. Please assess their impact in text below, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed.

Costs of option 5A. Establishing priorities for spectrum availability

- () Potential delay in the identification of spectrum due to coordination and cooperation process
- () Increased administrative burden for EU Member States and stakeholders
- () High financial cost for the EU and its Member States
- () Resistance from existing spectrum users and industries to spectrum allocation for wireless broadband
- () Other:

Benefits of option 5A. Establishing priorities for spectrum availability

- () Increased access to wireless broadband technologies for EU Member States, businesses and citizens
- () Improved spectrum efficiency and utilization
- () Enhanced innovation and technological development in the telecommunications sector
- () Improved coordination and cooperation among EU Member States in dealing with spectrum issues
- () Potential for increased economic growth in the EU telecommunications sector
- () Other:

Please explain your choice and, if possible, quantify the costs and benefits; where not possible, please provide a qualitative assessment. Please add any other comments to the costs and benefits above, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed. Please also identify the costs (quantifiable/qualitative) of not acting, i.e. if the proposed policy option is not followed.

Costs of option 5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines

- () Potential delay in the allowing the use of spectrum due to the roadmap process
- () Increased administrative burden for EU Member States and stakeholders
- () High financial cost for the EU and its Member States
- () Resistance from existing spectrum users and industries to spectrum allocation for wireless broadband
- () Other:

Benefits of option 5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines

- () Improved spectrum efficiency and utilization
- () Increased transparency and predictability for stakeholders regarding spectrum allocation
- () Enhanced innovation and technological development in the telecommunications sector
- () Improved coordination and cooperation among EU Member States in dealing with spectrum issues
- () Potential for increased economic growth in the EU telecommunications sector
- () Other:

Please explain your choice and, if possible, quantify the costs and benefits; where not possible, please provide a qualitative assessment. Please add any other comments to the costs and benefits above, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed. Please also identify the costs (quantifiable/qualitative) of not acting, i.e. if the proposed policy option is not followed.

If the interviewee has proposed other policy options, please quantify, if possible, the costs and benefits of the proposed policy option(s); where not possible, please provide a qualitative assessment. Please assess their impact in text below, including the practical impact on their own sector; whether other stakeholders will be affected; and any specific issues which must be addressed.

4.4 Other impacts of the policy options

How will the policy option(s) impact the 'do no significant harm' principle? (This aims to minimize negative impacts on people and the environment, e.g. human health, social and economic equity, and environmental sustainability). Mark only one oval per row.

Conforms
with 'do no

Partially
conforms with

Does not conform with 'do no significant
harm' principle

	significant harm' principle	'do no significant harm' principle	
4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions	()	()	()
4B. An obligation to assess spectrum sharing solutions for each new harmonised band	()	()	()
Other	()	()	()
5A. Establishing priorities for spectrum availability	()	()	()
5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines	()	()	()
Other	()	()	()

Please add any explanation for answer above

How will the policy option(s) impact the 'digital by default principle'? It means that digital channels, such as websites and apps, should be the default option for accessing government services, unless there is a specific reason why not. (NB it seems to us that any measure to improve spectrum access improves digitisation therefore conforms to the principle). Mark only one oval per row.

	Conforms with 'digital by default' principle	Partially conforms with 'digital by default' principle	Does not conform with 'digital by default' principle
4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4B. An obligation to assess spectrum sharing solutions for each new harmonised band	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5A. Establishing priorities for spectrum availability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

How will the policy option(s) impact the EU territories and regions (e.g. equitable treatment of urban and rural; cross-border issues)? Mark only one oval per row.

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions	()	()	()	()	()	()	()
4B. An obligation to assess spectrum sharing solutions for each new harmonised band	()	()	()	()	()	()	()
Other	()	()	()	()	()	()	()
5A. Establishing priorities for spectrum availability	()	()	()	()	()	()	()
5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines	()	()	()	()	()	()	()
Other	()	()	()	()	()	()	()

Please add any explanation for answer above

How will the policy option(s) impact the coordination with non-EU countries? Mark only one oval per row.

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
4A. Promoting the full range of	()	()	()	()	()	()	()

Please add any explanation for answer above

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
4A. Promoting the full range of technological spectrum sharing solutions and flexible	()	()	()	()	()	()	()

Please add any explanation for answer above

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
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Please add any explanation for answer above

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		Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions		()	()	()	()	()	()	()
4B. An obligation to assess spectrum sharing solutions for each new harmonised band		()	()	()	()	()	()	()

Please add any explanation for answer above

determining
frequency
bands and
deadlines

Other	()	()	()	()	()	()	()
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Please add any explanation for answer above

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How will the policy option(s) impact consumers? Mark only one oval per row.

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions	()	()	()	()	()	()	()
4B. An obligation to assess spectrum sharing solutions for each new harmonised band	()	()	()	()	()	()	()
Other	()	()	()	()	()	()	()
5A. Establishing priorities for spectrum availability	()	()	()	()	()	()	()
5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines	()	()	()	()	()	()	()
Other	()	()	()	()	()	()	()

Please add any explanation for answer above

--

4.5 Comparison of policy options

Assess each policy option in terms of its effectiveness (the extent to which it would achieve the objective) - Where 5 is highly effective and 1 is ineffective. Mark only one oval per row.

	5	4	3	2	1
4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4B. An obligation to assess spectrum sharing solutions for each new harmonised band	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5A. Establishing priorities for spectrum availability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

--

Assess each policy option in terms of its feasibility – Where 5 is very feasible and 1 is not feasible. Mark only one oval per row.

	5	4	3	2	1
4A. Promoting the full range of technological spectrum sharing solutions and	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

flexible licensing
solutions

4B. An obligation to assess spectrum sharing solutions for each new harmonised band	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5A. Establishing priorities for spectrum availability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

Assess each policy option in terms of its efficiency (respective key economic, social and environmental impacts and benefit/cost ratio, cost-effectiveness) – Where 5 is very efficient and 1 is inefficient. Mark only one oval per row.

	5	4	3	2	1
4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4B. An obligation to assess spectrum sharing solutions for each new harmonised band	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5A. Establishing priorities for spectrum availability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5B. Establishing priorities for	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

spectrum
availability +
determining
frequency bands
and deadlines

Other	()	()	()	()	()
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Please add any explanation for answer above

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Assess each policy option in terms of its coherence with other EU policy objectives, including the Charter for fundamental rights, and with other policy initiatives and instruments – Where 5 is very coherent and 1 is not coherent. Mark only one oval per row.

	5	4	3	2	1
4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions	()	()	()	()	()
4B. An obligation to assess spectrum sharing solutions for each new harmonised band	()	()	()	()	()
Other					
5A. Establishing priorities for spectrum availability	()	()	()	()	()
5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines	()	()	()	()	()
Other	()	()	()	()	()

Please add any explanation for answer above

--

Assess each policy option in terms of its future-proofing (the extent to which a policy option takes into account potential future developments and challenges, in order to ensure its continued effectiveness over time) – Where 5 is very future-proof and 1 is not future-proof. Mark only one oval per row.

	5	4	3	2	1
4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4B. An obligation to assess spectrum sharing solutions for each new harmonised band	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5A. Establishing priorities for spectrum availability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

Assess each policy option in terms of its coherence with European Climate Law and its binding legal framework and targets for reducing greenhouse gas emissions in the EU, how it addresses the challenge of climate change – Where 5 is very coherent and 1 is not coherent. Mark only one oval per row.

	5	4	3	2	1
4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4B. An obligation to assess spectrum sharing solutions for each new harmonised band	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5A. Establishing priorities for spectrum availability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any explanation for answer above

Is the policy option in proportion to the problem it is trying to solve – Where 5 is very proportionate and 1 is disproportionate. Mark only one oval per row.

	5	4	3	2	1
4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4B. An obligation to assess spectrum sharing solutions for each new harmonised band	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other					
5A. Establishing priorities for spectrum availability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other					

Please add any explanation for answer above

4.6 Preferred option

Preferred policy option(s)

☐ 4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions

☐ 4B. An obligation to assess spectrum sharing solutions for each new harmonised band

☐ Other:

Please add explanation for your preferred policy option(s)

☐ 5A. Establishing priorities for spectrum availability

☐ 5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines

☐ Other:

Please add explanation for your preferred policy option(s)

4.7 REFIT

The European Commission's regulatory fitness and performance programme (REFIT) aims to ensure that EU laws deliver on their objectives at a minimum cost for the benefit of citizens and businesses.

Under this programme, the Commission ensures that EU laws deliver their intended benefits for individuals and businesses, while simplifying existing EU laws and cutting red tape, whenever possible. The programme aims to make EU laws simpler, more targeted and easier to comply with.

What concerns, if any, do you have about the REFIT process?

4.8 Monitoring and evaluation

In the boxes below please indicate how actual impacts of the preferred policy option(s) should be monitored and evaluated; AND what indicators or metrics would be useful for assessing their success.

4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions

4B. An obligation to assess spectrum sharing solutions for each new harmonised band

5A. Establishing priorities for spectrum availability

5B. Establishing priorities for spectrum availability + determining frequency bands and deadlines

Other

4.9 Who is affected and how (applicable to policy options 4A and 4B)

Can you provide any estimates - preferably financial - or examples of the costs and benefits of your preferred policy option(s) for your industry/sector?

What stakeholder group(s) will be the main recipients of the benefits and/or the main bearers of the costs?

Are there any potential trade-offs or unintended consequences of the preferred policy option(s) that the stakeholder believes need to be considered?

2.11 What Sustainable Development Goals do you believe the preferred policy option(s) will contribute to? (Tick box to indicate contribution)

- ☐ No poverty
- ☐ Zero hunger
- ☐ Good Health and Well-being
- ☐ Quality Education
- ☐ Gender Equality
- ☐ Clean Water and Sanitation
- ☐ Affordable and Clean Energy
- ☐ Industry, Innovation and Infrastructure

- ☐ Reduced Inequality
- ☐ Sustainable Cities and Communities
- ☐ Responsible Consumption and Production
- ☐ Climate Action
- ☐ Life Below Water (sustainable use of oceans)
- ☐ Life on Land (sustainable use of land resources)
- ☐ Peace and Justice, Strong Institutions (rule of law, human rights, inclusive societies)
- ☐ Partnerships to achieve the Goal (international support to prevent climate change)
- ☐ Other:

Provide brief explanation of choices above

Provide any specific examples of how the preferred policy option(s) will contribute to these goals

4.10 Who is affected and how (applicable to policy options 5A and 5B)

Can you provide any estimates - preferably financial - or examples of the costs and benefits of your preferred policy option(s) for your industry/sector?

What stakeholder group(s) will be the main recipients of the benefits and/or the main bearers of the costs?

Are there any potential trade-offs or unintended consequences of the preferred policy option(s) that the stakeholder believes need to be considered?

2.11 What Sustainable Development Goals do you believe the preferred policy option(s) will contribute to? (Tick box to indicate contribution)

- ☐ No poverty
- ☐ Zero hunger
- ☐ Good Health and Well-being
- ☐ Quality Education

- () Gender Equality
- () Clean Water and Sanitation
- () Affordable and Clean Energy
- () Industry, Innovation and Infrastructure
- () Reduced Inequality
- () Sustainable Cities and Communities
- () Responsible Consumption and Production
- () Climate Action
- () Life Below Water (sustainable use of oceans)
- () Life on Land (sustainable use of land resources)
- () Peace and Justice, Strong Institutions (rule of law, human rights, inclusive societies)
- () Partnerships to achieve the Goal (international support to prevent climate change)
- () Other:

Provide brief explanation of choices above

Provide any specific examples of how the preferred policy option(s) will contribute to these goals

4.11 Competitiveness check

What impacts will the envisaged revision of the RSPP Decision have on their industry/sector's cost and price competitiveness? Mark only one oval per row

	Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
4A. Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions	()	()	()	()	()	()	()

Provide brief explanation of choices above

What impacts will the envisaged revision of the RSPP Decision have on their industry/sector's international competitiveness? Mark only one oval per row.

		Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
4A.		()	()	()	()	()	()	()
	Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions							
4B.	An obligation to assess spectrum	()	()	()	()	()	()	()

Provide brief explanation of choices above

What impacts will the envisaged revision of the RSPP Decision have on their industry/sector's innovative competitiveness (capacity to innovate)? Mark only one oval per row.

		Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
4A.	Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions	()	()	()	()	()	()	()
4B.	An obligation to assess spectrum sharing solutions for each new	()	()	()	()	()	()	()

Provide brief explanation of choices above

What impacts will the envisaged revision of the RSPP Decision have on SME competitiveness?
Mark only one oval per row.

		Strong positive	Moderate positive	Weak positive	Weak negative	Moderate negative	Strong negative	No impact
4A.		()	()	()	()	()	()	()
	Promoting the full range of technological spectrum sharing solutions and flexible licensing solutions							
4B.	An obligation to assess spectrum sharing solutions for each new harmonised band	()	()	()	()	()	()	()
	Other	()	()	()	()	()	()	()

5A.	()	()	()	()	()	()	()
Establishing priorities for spectrum availability							

5B.	()	()	()	()	()	()	()
Establishing priorities for spectrum availability + determining frequency bands and deadlines							

Other	()	()	()	()	()	()	()
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Provide brief explanation of choices above

EUTC believes the new RSPP must address the issue of spectrum for mission critical communications (PPDR, Transportation & Utilities) which was included in the original RSPP but where there has been little progress in the intervening 11 years:

- This would mirror work in ITU-R WP5A to corral all mission critical spectrum activities in one sub-working group. Potential benefits include:
 - o Harmonisation of spectrum for cross border activities
 - o Promotion of a global single market in products.
 - o Facilitate common working by companies operating across the whole European space. (eg Iberdrola, ESB, Enel, Eon, Vattenfall, Alliander etc)
- It should be observed that the unique requirements in these sectors for wide-area private radio networks were included in the original RSPP but are not currently addressed in EU spectrum policy.
- Enhancing control and operation of energy networks would be consistent with objectives in the EU Green Deal, assisting efforts for the reduction in CO2 emissions in key sectors such as electricity generation, home heating and electrification of transport.
- Utility networks need enhanced control and resilience to mitigate the effects of climate change on their networks, thereby safeguarding the social welfare of European citizens and consumers.
- Establishing a thriving harmonised European market for smart utility products and services would act as a launch pad for global competitiveness by European industry.