

## Use of the 1781.7-1785.0 / 1876.7-1880.0 MHz Bands for the provision of GSM 1800 telecommunications services - a consultation document – The DECT Forum View

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### Wide-area public use

**Question 1** *Given the other potential uses outlined in this document, do you consider it most appropriate to make the spectrum available for wide-area public use?*

Answer 1 The DECT Forum considers it most appropriate to make the spectrum available to wide-area public use.

**Question 2** *If your answer to question 1 is yes, do you consider it most appropriate for the spectrum to be used to supplement the spectrum of the existing GSM operators, or to be made available for potential new GSM operators on a regional or national basis?*

Answer 2: The DECT Forum has no specific view on whether the spectrum should be awarded to an existing or a new GSM operator

**Question 3** *If your answers to questions 1 and 2 are yes, do you consider it most appropriate for the spectrum to be awarded via an auction process?*

Answer 3: The DECT Forum has no specific view on the procedure how the spectrum should be awarded.

### Short-range, low-power GSM use on a licence-exempt basis

**Question 4** *Given the other potential uses outlined in this document, do you consider it most appropriate to make the spectrum available for short-range, low-power GSM use on a licence-exempt basis?*

Answer 4: The DECT Forum considers the GSM technology as most inappropriate for any use which is not under some regulatory control. Unlike DECT, GSM does not offer the necessary functionality to allow uncoordinated use as e.g. the FCC part 15 specifies.

We clearly are against the use of GSM in an uncoordinated manner.

**Question 5** *If your answer to question 4 is yes, what kinds of application do you anticipate will develop? Estimates of potential market size and anticipated penetration would also be useful.*

Answer 5: Not applicable.

**Question 6** *If your answer to question 4 is yes, should the use of this spectrum for the provision of public services be allowed?*

Answer 6: Spectrum that can be used “license-exempt” in the sense that it can be used in an uncoordinated manner, must comply with certain minimum requirements, e.g. the FCC part 15 requirements. DECT and other technologies are appropriate for this. The DECT Forum sees no reason why any of the compliant technologies should be restricted to private use. Any compliant technology should be allowed for public (and outdoor) use.

Spectrum should not be made available for public (and private) license-exempt GSM services.

**Question 7** *If your answer to question 6 is yes, specifically what kinds of public-service offerings do you anticipate will develop? Estimates of potential market size and anticipated penetration would also be useful.*

Answer 7: Not applicable.

## Maintaining the Status Quo

**Question 8** *Do you consider it prudent not to release the spectrum at this stage but to keep it unassigned, thus assisting future migration to 3G and facilitating T&D work*

Answer 8: The DECT Forum does agree to assign the released spectrum to licensed GSM services under the condition that the ERC Reports recommendations for engineering, in particular that outdoor GSM BTS should have the BCCH channel at least 2 MHz apart from the DECT band are enforced.

**Question 9** *Do you consider it necessary to limit future use of the spectrum for a set period, to ensure that future migration to 3G is not hindered?*

Answer 9: We do not believe that release of the spectrum at the present time poses an obstacle to the development of 3G services.

**Question 10** *If your answer to question 9 is yes, what period do you consider is appropriate?*

Answer 10: Not applicable.

## Technology neutrality

**Question 11** *Is it desirable and practical to make the spectrum available in a technology-neutral way, either for wide-area public use or for short-range, low-power, licence-exempt use?*

Answer 11: The DECT Forum view is that spectrum allocations should not hinder the technology development. As such, we believe that spectrum allocations should never mandate a particular technology, but should enforce specifications that guarantee the coexistence of various technologies in the same frequency band(s).