

Brussels & Paris, 30/06/2017

Letter sent by e-mail to

European Commission DG Connect

Mr Andreas Geiss

Head of unit spectrum

European Commission DG Move

Mr Keir Fitch

Head of unit railway interoperability and
safety

Dr Libor Lochman

CER Executive Director

Jean Pierre Loubinoux

UIC Director-General

Monika Heiming

EIM Executive Director

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EU Agency for Railway

Mr Josef Doppelbauer

Dear Mr Geiss, dear Mr Fitch,

The harmonisation of appropriate spectrum is a key success condition for efficient railway operation with the roll out of ERTMS in Europe. Beside of today's harmonised 2x4 MHz spectrum for rail, the deployment of ERTMS, the migration and the operation of the GSM-R successor technology require additional harmonised spectrum to fulfil railway's operational obligations. Railways are the backbone of the European transport system and ERTMS as the European system is an essential enabler of that. ERTMS is heavily relying on the mobile radio communication. Moreover, today's successful technology GSM-R has to be migrated to the successor technology and **therefore adequate spectrum is needed.**

CER, EIM, ROC IG and UIC are grateful for the organisation of the workshop on the efficient use of 870-876MHz/915-921MHz. It became clear that a spectrum harmonisation in this band for the SRD sector as indicated in the addendum of CEPT Report 59 would de facto exclude the possibility for the rail sector to harmonise the 2x3MHz ER-GSM Band adjacent to the R-GSM band. During the workshop, it was acknowledged that the primary use of the paired band 873-876 MHz/918-921MHz is for military applications. The assignment of this band to the rail sector in several European countries was agreed by the concerned military administrations and makes this band the preferred solution for the extension of GSM-R (see ECC DEC 04/06) and the successor of GSM-R (see ETSI TR 103 333).

CER, EIM, ROC IG and UIC note the steps taken by DG CONNECT asking for input from the rail sector and SRD sector on a possible compromise. We note the proposal of DG CONNECT to study a scenario for harmonisation of a reduced 2x1.4 MHz spectrum adjacent to the R-GSM band out of the requested 2x3 MHz considered by the rail sector for the migration of the core safety and interoperable applications. Some European countries already assigned the ER-GSM band to the rail operation, the decision taken should therefore not put any additional regulatory constraints on these countries.

As agreed during the workshop, **CER, EIM, ROC IG and UIC are committed to provide further elements to support RSCOM debates in October.** The timeline given by DG CONNECT for a response from the rail sector is challenging in order to allow for in depth analysis of all possible conditions of an acceptable compromise. It must be noted that the feasibility as also the coexistence between the involved radio technologies is currently subject to FM 56 studies as per the CEPT WG FM process. Therefore, we would like to strongly draw the attention of DG CONNECT and DG MOVE to the ongoing activities in FM 56. The result of the FM 56 studies is essential for defining the feasibility and the conditions for today's and future coexistence between rail telecommunication and SRD in the coming decades. **Further steps are needed before harmonisation is decided; we expect RSCOM to consider the FM56 conclusions within this decision process in order to avoid putting the future of ERTMS and consequently the interoperability of European Railways at risk.**

Yours sincerely,



Libor Lochman
CER Executive Director



Jean-Pierre Loubinoux
UIC Director-General



Monika Heimig
EIM Executive Director



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