

Position Paper

24 March 2025

D2D services and access EU market

Summary

The Radio Spectrum Policy Group (RSPG) has launched a public consultation on the Draft Opinion «on the EU-level policy approach to satellite Direct-to-Device connectivity and related Single Market issues».

Bitkom welcomes the opportunity to provide comments. In general, Bitkom supports the development of measures to harmonise technical conditions, improve market transparency and prevent regulatory fragmentation, as well as serving the fundamental needs of specific verticals.

We support the goal of promoting innovation in the field of satellite communications and, at the same time, ensuring the competitiveness of Europe. Close coordination with industry and regulatory authorities is essential in order to develop practicable solutions and avoid lagging behind other regions.

D2D-IMT services

Bitkom welcomes the Draft Opinion's attention to the various challenges of introducing D2D-IMT in ECS spectrum bands. However, Bitkom emphasizes that whenever satellite D2D is used in IMT bands, it is intended solely to supplement terrestrial mobile coverage. The protection of terrestrial mobile networks has to be secured at all times. D2D-IMT must not, under any circumstances, negatively impact the quality of service (QoS) or coverage of terrestrial mobile services. Given that the European area is covered by mobile networks, the potential for D2D-IMT as a supplement to terrestrial coverage is still open.

We support the RSPG recommendation to authorise D2D-IMT as an integral part of the MNO's terrestrial ECS licence. MNOs should be able to explore the D2D-IMT opportunity in their licensed spectrum in cooperation with satellite operators, provided that all conditions to protect the terrestrial mobile service are defined and can be met. However, the satellite D2D service in IMT bands should only be allowed based on a request and an agreement with the MNO holding the licence. This benefits the coordination between terrestrial and satellite use and provides certainty in relation to

compliance with national and European legal, regulatory and security requirements. The usage of harmonised IMT spectrum for D2D-IMT has to be based on commercial agreements between the satellite provider and the respective MNO.

Bitkom welcomes the RSPG recommendation for a mandate to CEPT to develop harmonised technical conditions for D2D-IMT and the provisions to properly consider the WRC-27 outcome. Consequently, any conditions defined or applied within EU (e.g., for trials or possible bilateral agreements) before WRC-27 should be solely based on conservative assumptions on provisional basis, e.g., under ITU RR4.4.

D2D – MES services

Bitkom agrees with RSPG finding, that there are no major hindrances to providing D2D-MES services and, in general, supports the recommendation that there is currently no need to engage in this on a European level. However, WRC-27 will discuss additional MSS allocations. Parts of the considered frequency ranges overlap with harmonised ECS bands and with considerations of D2D-IMT. Bitkom suggests that RSPG does not support any new MSS allocations in harmonised ECS bands or parts thereof, except those considered regarding D2D-IMT.

D2D – IoT-SRD (Short range devices)

D2D-IoT has been recently discussed in CEPT. This technology may only serve dedicated use cases with very low data rates. Bitkom supports the recommendation to maintain a list of providing satellite operators being entitled to provide these services. A major requirement is to protect the terrestrial mobile service in bands adjacent to SRD.

D2D – IoT MSS < 1 GHz

The available bandwidth in MSS bands below 1 GHz is quite limited, making it difficult to satisfy a wide number of use cases. RSPG recommends considering the results of WRC-27 agenda items 1.12 and 1.14. However, these agenda items do not consider bands below <1 GHz. Bitkom invites RSPG to further clarify when developing the final version of this opinion. If proprietary technologies are used a larger ecosystem of NTN chipsets may not be available.

Access to national and EU markets

For the industry, harmonised regulation across Europe is essential. National fragmentation hinders the creation of a unified European market.

If satellite D2D operators intend to deploy their services in IMT bands, this needs to be in cooperation with an MNO, which would request to supplement its service: Since terrestrial mobile network operators are the primary holders of IMT spectrum usage

rights, satellite D2D providers must arrange an agreement with the respective license holder before gaining access to the spectrum.

Opinion and Recommendations

Bitkom is of the opinion that for specific verticals such as the automotive sector seamless and ubiquitous connectivity is very important. Satellite-based D2D services could be a key enabler to reach this goal.

With respect to automotive applications D2D-IMT might offer an option to address state of the art cellular radio equipment for mobile communication in connected vehicles.

Regarding D2D-IMT services, Bitkom advocates for enabling satellite D2D emergency calling, when appropriate governmental structures and processes are given. Under current regulations, mobile network operators are required to route all emergency calls, not just those from their own customers. Bitkom supports extending this routing obligation to satellite D2D-IMT services. This is considered one of the major benefits of D2D-IMT services for Europe, helping to improve the safety of EU citizens in remote locations.

The European Commission considers proposing an amendment to the current ECS harmonisation decisions under the Radio Spectrum Decision, based on the CEPT response to the Mandate, to enable the introduction of D2D-IMT under harmonised technical conditions.

Bitkom agrees that the European Commission should offer support to solve non-compliance issues if not addressable on national basis. The various existing mechanisms could be a starting point for identifying appropriate proceedings in case of D2D services. However, Bitkom encourages RSPG to carefully consider that those measures contain an appropriate enforcement regime to ensure the protection of other services such as the terrestrial mobile service.

Bitkom represents more than 2,200 companies from the digital economy. They generate an annual turnover of 200 billion euros in Germany and employ more than 2 million people. Among the members are 1,000 small and medium-sized businesses, over 500 start-ups and almost all global players. These companies provide services in software, IT, telecommunications or the internet, produce hardware and consumer electronics, work in digital media, create content, operate platforms or are in other ways affiliated with the digital economy. 82 percent of the members' headquarters are in Germany, 8 percent in the rest of the EU and 7 percent in the US. 3 percent are from other regions of the world. Bitkom promotes and drives the digital transformation of the German economy and advocates for citizens to participate in and benefit from digitalisation. At the heart of Bitkom's concerns are ensuring a strong European digital policy and a fully integrated digital single market, as well as making Germany a key driver of digital change in Europe and the world.

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WG Communication technologies and WG Frequencies

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