Dynamic Spectrum Alliance
http://www.dynamicspectrumalliance.org

March 27, 2026

RSPG Secretariat Office
L-51 05/DCS
Commission Européenne
1049 Bruxelles, BELGIQUE
cnect-rspg@ec.europa.eu

Re: Draft RSPG Opinion on a 6G spectrum roadmap

Dear RSPG Secretariat,

The Dynamic Spectrum Alliance[11] (DSA) appreciates the opportunity to provide comments on the Radio Spectrum Policy Group (RSPG) Draft Opinion on a 6G spectrum roadmap (the Draft Opinion). As a global organization committed to advancing spectrum policies that enable innovation and connectivity, the DSA supports the RSPG's efforts to establish a forward-looking and harmonized spectrum framework that facilitates competition, enhances connectivity, and promotes investment. We welcome continued dialogue and stand ready to provide technical insight, deployment case studies, and stakeholder perspectives to assist in shaping inclusive and future-proof spectrum policies.

Sincerely,

Dr. Martha Suárez
President
Dynamic Spectrum Alliance

[1] The DSA is a global, cross-industry, not for profit organization advocating for laws, regulations, and economic best practices that will lead to more efficient utilization of spectrum, fostering innovation and affordable connectivity for all. Our membership spans multinationals, small-and medium-sized enterprises, as well as academic, research and other organizations from around the world all working to create innovative solutions that will benefit consumers and businesses alike by making spectrum abundant through dynamic spectrum sharing. A full list of DSA members is available on the DSA's website at: https://www.dynamicspectrumalliance.org/members.

1. Strategic vision issues: the role of licence-exempt technologies

The DSA applauds the RSPG for its recognition of strategic issues beyond the mere identification of possible spectrum bands that will be critical to ensure 6G rollout in Europe is successful, available to consumers where and when needed, and supports industrial and societal transformation and economic growth. We agree that such strategic issues include those identified in the Draft Opinion, namely integration of non-terrestrial networks, spectrum sharing solutions, and authorisation regimes.

In addition to these important issues, we recommend that RSPG explicitly acknowledge in the 6G Spectrum Roadmap the importance of licence-exempt technologies in meeting consumer and enterprise connectivity needs and complementing wide-area and local mobile networks. The Draft Opinion notes "the importance of seamless interoperability between mobile networks and fixed broadband networks to which WAS/RLAN provides wireless access." We applaud this recognition. However, to ensure licence-exempt technologies and spectrum needs are suitably addressed, we encourage the RSPG to include in the 6G Spectrum Roadmap language similar to that in the 6G Strategic Vision Report, namely "Licence-exempt technologies continue to evolve and will play multiple important 6G roles. Offloading 6G mobile traffic to licence-exempt networks (e.g., Wi-Fi) is one important use case. Licence-exempt spectrum supports a variety of use cases, like wireless broadband and IoT applications."[2]

Furthermore, the DSA believes that future networks in a 6G ecosystem should:

- Be heterogenous and include mobile, fixed, and satellite components
- Comprise both public and private deployments
- Incorporate both licensed and licence-exempt technologies
- Support technology-neutrality in a manner that promotes several advanced gigabit technologies, and
- Rely on spectrum sharing mechanisms that enable ongoing spectrum use by incumbents.

We encourage the RSPG to incorporate these strategic issues in its 6G Spectrum Roadmap.

2. Innovative authorization regimes

The RSPG notes that "obligations such as use-it-or-lose-it, use-it-or-lease-it or use-it-or-share-it in spectrum licenses could play an important role in making spectrum available for local networks, fostering innovation and addressing specific connectivity needs." The DSA supports innovative licensing approaches to ensure spectrum is being used efficiently and that diversity of access options are available to users. We note that several European administrations are licensing spectrum on a local basis for a variety of use cases, including private networks. While the DSA supports such efforts to make spectrum available for specific connectivity needs, the process for spectrum assignment remains manual and less spectrally efficient than it could be. Given that automated dynamic spectrum management system (DSMS) capabilities have proven successful in multiple bands and countries, the DSA encourages regulators in Europe to consider supporting DSMS approaches to sharing spectrum for local licensing.[3] We recommend that the RSPG Draft Opinion include a reference to existing DSMS capabilities that can be readily adapted to the European market.

---

[2] A good example of industry collaboration which embraces this more holistic view of these strategic issues can be seen in the WBA 6G vision statement https://wballiance.com/6g-vision-statement/.
[3] See https://www.dynamicspectrumalliance.org/solving-the-spectrum-crunch.pdf

3. The role of Non-Terrestrial Networks

In the 6G Spectrum Roadmap, the RSPG acknowledges that "6G should build on the coordinated evolution and interoperability of terrestrial and non-terrestrial networks (NTN), in order to capitalise on the most advantageous characteristics of both systems." The DSA fully supports this assertion and encourages the RSPG to consider how existing automated DSMS capabilities could be leveraged to manage interference between satellite systems (GEO/LEO) and terrestrial mobile services. DSMS solutions will allow for spectrum sharing between services "with the goal of using the finite resource more efficiently and accommodate the capacity requirements of the next generation mobile networks." Europe should build upon international experience with dynamic sharing tools to scale deployments effectively while safeguarding incumbent services.

4. Immediate Access to the Upper 6 GHz band

The RSPG Draft Opinion states that the future of the Upper 6 GHz band depends on the outcome of the WRC-27 and that it is currently subject to an EC mandate for future harmonised conditions taking into account the protection of incumbent services in this band and adjacent bands. The DSA would like to highlight that the main objective of the EC Mandate is to enable shared use of the Upper 6 GHz band by licensed Mobile Fixed Communication Networks (MFCN), licence-exempt (WAS/RLAN), and incumbent services. The recommendation to await the outcome of WRC-27 does not advance shared use of the band. Furthermore, it runs counter to most of the responses to the RSPG's own consultation, reflecting the views of thousands of European stakeholders, including industry, communities, and public service providers. European consumers will be disadvantaged without immediate licence-exempt access to the upper 6 GHz spectrum.

Therefore, the DSA strongly recommends that regulatory clarity on the use of the 6425-7125 MHz band should be provided without undue delay and that work to develop harmonised technical conditions should begin now to accelerate licence-exempt use. Initiating the regulatory work necessary to enable a European-harmonised approach will provide clarity and investment certainty while facilitating equipment development in preparation for future deployment.

The DSA cautions that the RSPG's 6G strategy is predicated on a "build it and they will come" approach, which is both inefficient and outdated. The 5G spectrum roadmap developed by the RSPG in 2016 may have accelerated 5G deployment in Europe but has not resulted in an appreciable adoption and usage of 5G services.[4] 6G demand projections and consequently spectrum assignments should be based on the existence of realistic and credible use cases.

For these reasons, the DSA urges the RSPG to focus on solutions to provide immediate access to the Upper 6 GHz band so that the benefits of licence-exempt technologies could be made available to all European citizens in a timely manner, driving industrial and societal transformation and economic growth in Europe well before 2030. In the interim, work can continue on longer-term sharing solutions that will enable future deployment of mobile 6G IMT systems. This approach will ultimately contribute to the successful and sustainable deployment of both licence-exempt systems as well as 6G networks in Europe.

[4] "Despite the high expectations and promises of 5G, its deployment and adoption in Europe has been relatively slow and uneven, compared to other regions such as the US, China, and South Korea. The European Commission recently reported that 5G coverage in key frequency ranges for its most commercial applications is only at 41% across the EU 27 states." International Development Research Network (IDRN), "Europe's Quest for 5G: Policy and Opportunities".