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

January 5, 2026

RSPG Secretariat
Office L-51 05/DCS
Commission européenne
1049 Bruxelles, BELGIQUE

Re: Draft RSPG Work Programme for 2026 and beyond

Dear RSPG Secretariat,

The Dynamic Spectrum Alliance[1] (DSA) appreciates the opportunity to provide comments and recommendations on the Radio Spectrum Policy Group (RSPG) Draft Work Programme for 2026 and beyond.

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
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[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 Spectrum Matters

Recommendation: Add development of a "Licence-Exempt Roadmap" to the Work Programme.

In the Draft Work Programme, RSPG notes that it intends to follow the Digital Decade 2030 process and to consider "other EU Policy/initiatives that may require additional contribution from RSPG which are not already covered by the other work items of its Work Program." To achieve these goals, the DSA recommends that the RSPG add to its Work Program the development of a "*Licence-Exempt Roadmap*" to mirror and complement its planned work on a "*6G spectrum roadmap*."

The Digital Decade Policy Programme 2030 (DDPP) states that 1) all end users at a fixed location should be covered by a gigabit network up to the network termination point; 2) all populated areas should be covered by a next-generation wireless high-speed network with performance at least equivalent to that of 5G. It is critical to acknowledge that multiple technologies, including those relying on licence-exempt spectrum access, will contribute to achieving these targets. Mobile networks are not the only systems that will have spectrum requirements that should be addressed. Licence-exempt technologies continue to evolve and play multiple important roles requiring extended spectrum access. Licence-exempt technologies support a variety of critical use cases (e.g., schools, universities, hospitals, enterprises, stadiums, factories, warehouses, and homes) and deliver more than 85% of data traffic in most European countries. Furthermore, mobile networks rely heavily on licence-exempt networks to offload traffic, particularly indoors.

It is imperative that the RSPG does not focus exclusively on licenced spectrum for 6G but that it also develops recommendations to support further growth of use cases that rely on licence-exempt spectrum. We therefore urge RSPG to add to its Work Programme a "*Licence-exempt roadmap*" that includes recommendations that will foster the growth and sustainability of services that rely on licence-exempt spectrum, promote the convergence of different networks using different frequency bands, with a particular focus on integrating solutions such as Passpoint and OpenRoaming to deliver seamless connectivity across mobile and fixed networks, and identify solutions for supporting high-performance, licence-exempt indoor connectivity, particularly for environments such as universities, hospitals, and businesses that require efficient, sustainable solutions.

2. 6G Spectrum Roadmap

Recommendation: Develop recommendations to enable immediate licence-exempt access to the upper 6 GHz band while identifying solutions to enable sharing between licence-exempt and future licenced IMT.

In its Draft Work Programme, the RSPG indicates that it plans to develop an EU-level 6G spectrum roadmap and make recommendations on possible spectrum band(s), spectrum sharing, and non-terrestrial networks, taking into account the services to be offered and the goals to be achieved by the deployment of 6G networks in accordance with the RSPG 6G strategic vision, the long term vision for the upper 6 GHz band, and recommendations in the Opinion for the upper 6 GHz band.

A credible roadmap that aims to achieve EU digital policy objectives must include *recommendations on how to enable immediate non-prioritised use of the upper 6 GHz band by licence-exempt systems* while work continues on a longer-term plan for sharing between licence-exempt and future licensed IMT. We encourage the RSPG to consider the technological and economic realities currently facing the European connectivity ecosystem and to recognise the value of a flexible spectrum landscape

that can evolve alongside future technological innovations. By focusing on solutions to provide immediate access to the upper 6 GHz band consumers and enterprises will be able to take advantage of the existing licence-exempt ecosystem. Work can continue in the interim on longer-term sharing solutions that will enable future deployment of mobile IMT systems. This approach will ultimately contribute to the successful and sustainable deployment of both licence-exempt systems as well as 6G in Europe.

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