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Form that has to be used as front page when answering a public consultation

GENERAL INFORMATION

Title and date of the consultation:

Consult-2026-A5, Publication date 31/03/2026

To (natural persons designated as contact persons within BIPT in the document that is submitted for consultation):

Joke Van Osselaer, Senior Advisor (+32 2 226 89 75)

Enter your name here if you are responding as a private person:

-

Enter the name of the legal person responding here:

Dynamic Spectrum Alliance, DSA

Enter your name here if you are acting as the point of contact for the legal person mentioned above:

Martha Suarez, DSA President

CONFIDENTIALITY OF THE DATA

The following information is considered to be confidential by the respondent (tick off what is applicable)a:

- Nihil ☒
- The identity of the private person answering ☐
- The identity of the legal person answering ☐
- The identity of the natural person acting as contact person for the legal person mentioned above ☐
- Certain parts of the answer ☐

In the latter case the respondent needs to provide a public and confidential version of his contribution. In the confidential version the confidential parts shall be identified in the body of the text.

In case of conflicts between this form and a statement in the answer (in particular the standard mention regarding confidentiality in e-mails), the respondent recognises that BIPT only needs to take into account this form.

WARNING

In conformity with Article 140 of the Act of 13 June 2005 on electronic communications, the draft decisions of BIPT that could have considerable consequences for a relevant market, are submitted for public consultation. The results thereof have to be published, in conformity with the rules regarding the confidentiality of corporate data.
It is therefore in the interest of the respondent to provide for an exhaustive and accurate list of the confidential information in order to avoid that information from being made public in the context of the publication of the results of the public consultation.
The respondents shall, however, only mark as confidential that information that is truly confidential as
BIPT has the possibility to contest the confidential nature of the information by virtue of Article 23, § 3, of the Act of 17 January 2003 on the status of the regulator of the Belgian postal and telecommunications sectors.

DATE AND SIGNATURE

11 May 2026

http://www.dynamicspectrumalliance.org

DSA
DYNAMIC • SPECTRUM • ALLIANCE

May 11, 2026

Belgian Institute for Postal services and Telecommunications
Boulevard du Roi Albert II 32 box 10 |
1000 Brussels

Re: Call for Input - 2027-2029 Strategic Plan

Dear Sir/Madam,

The Dynamic Spectrum Alliance (DSA)[1] welcomes the opportunity to contribute to BIPT's preparation of the Strategic Plan 2027–2029. As Belgium's connectivity landscape continues to evolve, spectrum policy and regulatory frameworks will play an increasingly important role in enabling innovation, supporting investment, and advancing digital transformation across the economy.

Today's communications environment is increasingly integrated, with terrestrial fixed broadband, Local Area Networks such as Wi-Fi, terrestrial cellular networks, satellite networks, cloud services, and emerging digital applications operating as complementary elements of a broader connectivity ecosystem rather than as isolated platforms. At the same time, rising demand for high-capacity connectivity, growing digitalisation across industry and public services, and the emergence of new spectrum-sharing technologies are creating both new opportunities and new regulatory challenges.

In this context, the DSA believes that future regulatory approaches should remain technology-neutral, evidence-based, and sufficiently flexible to support evolving connectivity models and more efficient use of spectrum. This includes recognising the growing importance of licence-exempt technologies and their spectrum needs for indoor connectivity and enterprise digitalisation, alongside the opportunities offered by proven dynamic spectrum access mechanisms.

The following comments focus on strategic priorities that we believe can help support Belgium's long-term connectivity objectives and contribute to a more adaptive, resilient, and forward-looking regulatory framework. DSA also recognises BIPT's continued efforts to maintain a balanced and forward-looking regulatory framework in a rapidly evolving connectivity environment.

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

Q2. Which two or three developments, trends or risks should the BIPT prioritise while preparing the next three-year plan?

BIPT should continue its evidence-based approach to regulation, regularly assessing how connectivity is actually being used in Belgium, including the evolution of fiber-supported fixed broadband access, which reinforces the need of high-throughput, low latency Wi-Fi networks, ideally differentiating between households and enterprise users.

Wi-Fi combined with different broadband backhaul solutions, such as fiber, already carries a substantial share of Internet traffic,[2] supported by the rapid growth of fixed broadband networks. Between 2019 and 2025, global fixed-broadband traffic increased from below 2,000 exabytes to more than 7,000 exabytes, while mobile-broadband traffic grew from below 500 exabytes to over 1,500 exabytes. In Europe, average fixed-broadband usage reached approximately 442 GB per subscription per month, compared to the global average of 369 GB.

These trends demonstrate the growing importance of high-capacity indoor connectivity and the complementary relationship between fixed, Wi-Fi, and mobile networks. Connectivity is increasingly delivered through a complementary ecosystem in which fixed and wireless technologies operate together rather than as isolated platforms. A significant share of data traffic is carried indoors over Wi-Fi and fixed broadband infrastructure, while mobile networks provide mobility and wide-area coverage. Future spectrum and connectivity policies should therefore be informed by real usage patterns, traffic distribution, and the interaction between these different layers of connectivity.

In this context, BIPT could consider undertaking a broader market assessment examining how consumers, enterprises, public institutions, and industrial users access and use connectivity services. Such an assessment should not focus exclusively on consumer mobile demand, but also on enterprise requirements, including high-capacity indoor connectivity, industrial digitalisation, cloud applications, private networks, logistics, and emerging AI-driven services. These developments are expected to significantly increase demand for reliable, low-latency local connectivity and broader access to spectrum resources, including licence-exempt spectrum.

While the lower 6 GHz decision represented an important step for Europe's connectivity ecosystem, evolving demand for high-capacity indoor and enterprise connectivity may justify consideration of additional licence-exempt access over time, including in portions of the upper 6 GHz band where coexistence can be demonstrated. The next three-year plan could usefully consider options to extend licence-exempt access to the upper 6 GHz band, otherwise, there is a risk that Belgium could face challenges in maintaining international competitiveness, with enterprises facing connectivity limitations comparted to their counterparts in North America or in relevant Asian markets such as Korea or Japan.

Another important trend is the growing relevance of spectrum sharing and dynamic access models. As spectrum demand increases, traditional static allocation approaches may become less efficient in supporting diverse and evolving connectivity needs. Internationally, regulators are increasingly exploring more flexible frameworks, including database-assisted coordination, dynamic spectrum access, and hybrid sharing approaches. BIPT could therefore continue to monitor international developments closely, particularly in bands such as 6 GHz where different technologies and services may coexist through modern spectrum management mechanisms.

Finally, BIPT should also consider the long-term implications of increasing digitalisation across the economy, including smart manufacturing, connected transport, immersive applications, and public-sector digital infrastructure. These developments will require regulatory frameworks that are adaptable, technology-neutral, and capable of supporting innovation across multiple sectors simultaneously.

[2] https://www.itu.int/itu-d/reports/statistics/2025/10/15/ff25-internet-traffic/

Q3. In your opinion, in 2030, what does a successful regulator/supervisor look like? What key elements, skills or approaches are crucial in this regard?

A successful regulator in 2030 will be one that adopts a flexible, evidence-based, and innovation-oriented approach to spectrum management and connectivity policy. Rather than relying only on traditional static regulatory models, a successful regulator would be using dynamic, data-driven, and shared access mechanisms to certain spectrum resources while continuing to ensure the appropriate protection of incumbent services.

An effective regulator should therefore develop strong expertise in spectrum sharing frameworks, database-assisted coordination systems, and dynamic spectrum access mechanisms. International developments already demonstrate the growing importance of such approaches. For example, the United Kingdom has been actively exploring innovative spectrum-sharing models[3] and more flexible access[4] frameworks as part of its broader spectrum modernisation efforts. These approaches illustrate how regulators can move toward more adaptive and efficient spectrum management models that better reflect real deployment conditions and evolving connectivity demands.

In this context, BIPT could position itself as a forward-looking regulator by actively studying and preparing for the implementation of modern sharing approaches, including potential future sharing frameworks in bands such as the upper 6 GHz range. This does not necessarily require immediate regulatory decisions, but it does require reinforcing institutional expertise, technical updates, and continuous market assessment to support policy flexibility in 2030.

A successful regulator in 2030 should also take a holistic view of connectivity ecosystems. Future regulatory success will depend not only on supporting nationwide mobile coverage, but also on recognising the growing importance of indoor connectivity, Wi-Fi evolution, enterprise networks, satellite solutions, cloud infrastructure, and industrial digital transformation.

BIPT is a regulator that has combined technical expertise with engagement across industry, academia, and international regulatory communities. DSA encourages BIPT to build further on these strengths to support increasingly progressive and forward-looking policymaking, while continuing to promote innovation, investment, and efficient spectrum use for different sectors (fiber, Wi-Fi, satellite and mobile).

[3] https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-3-4-weeks/automated-frequency-coordination-afc-for-the-6-ghz-frequency-band/main-docs/consultation_enabling-automated-frequency-coordination-afc-in-the-6-ghz-band.pdf?v=410328

[4] https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-3-4-weeks/consultation-expanding-access-to-the-6-ghz-band-for-commercial-mobile-and-wi-fi-services/main-document/expanding-access-to-the-6-ghz-band-for-commercial-mobile-and-wi-fi-services.pdf?v=410329