|  |  |  |
| --- | --- | --- |
| ECC PT1 | | ECC PT1(21)XXX |
| ECC PT1 #72 | | |
| Hybrid: Copenhagen and web meeting, 26-30 September 2022 | | |
|  | | |
| Date issued: | 30 September 2022 | |
| Subject: | Reply LS to WGFM on implementation status information and RIS Templates | |
| **To:** | Mr. Vincent Durepaire, WG FM Chairman  E-mail: [vincent.durepaire@anfr.fr](mailto:vincent.durepaire@anfr.fr) | |

Dear Vincent,

ECC PT1 has reviewed the request from WGFM of 11 February ([FM(22)040Annex33](https://www.cept.org/Documents/wg-fm/68965/fm-22-040annex33_ls-to-pt1-on-implementation-status-information-and-ris-templates)/[ECC PT1(22)075](https://www.cept.org/Documents/ecc-pt1/69365/ecc-pt1-22-075_ls-from-wgfm-to-pt1-on-implementation-status-information-and-ris-templates)) on the subject of implementation status information and RIS templates.

In response to the questions raised by WGFM:

1. *For which ECC Decisions and ECC Recommendations is an implementation status information required or not and in case why not?*
   1. ECC Decisions: ECC PT1 believes that implementation status information is still required for all ECC Decisions under its responsibility. These ECC Decisions largely relate to harmonisation of spectrum for MFCN, and national information on implementation is relevant to indicate the status of availability of particular bands across CEPT.
   2. ECC Recommendations: The ECC Recommendations under ECC PT1’s responsibility relate to either cross-border coordination or guidance to be applied on a national basis. In both these cases the use of a specific Recommendation is on a voluntary basis and therefore implementation is not applicable, i.e. there is no need/obligation for the administration to transpose the Recommendation into national law. ECC PT1 therefore supports to maintain the status quo where no implementation information recorded for these ECC Recommendations.
2. *For which ECC Decisions is a RIS Template required or not and in case why not?*

ECC PT1 agrees with WGFM’s assessment that RIS templates are not required for EU harmonised bands according to Article 8.1.a of the RED. Furthermore, ECC PT1 notes that RIS templates have not been provided for several ECC Decisions for several years and this did not seem to lead to any issues for administrations in implementing these ECC Decisions, including the 2 GSM Decisions highlighted by WGFM. In addition, for many of the ECC Decisions prepared by ECC PT1, there are also corresponding Commission Implementing Decisions.

1. *Proposal for harmonised implementation status identifiers for ECC Decisions and ECC Recommendations.*

ECC PT1 supports the proposed improvements to the identifiers and agrees that “Committed” and “Planned” could be merged. It is further noted that “Under study” may no longer be relevant and this category could be removed.

Best regards,

Steve Green

ECC PT1 Chairman

E-mail: [steve.green@ofcom.org.uk](mailto:steve.green@ofcom.org.uk)