Response to the RSPG draft Opinion on the ITU-R World Radiocommunication Conference 2023

1. Motivation and background

ZVEI welcomes the opportunity to provide feedback on the RSPG´s draft opinion regarding the ITU-R World Radiocommunication Conference 2023 (WRC23).
Furthermore, we would like to emphasize, that we fully recognize the importance of the RSPG´s opinions in advising the European Commission in spectrum matters.

ZVEI - German Electro and Digital Industry Association represents both the manufacturers of components needed for 5G infrastructure as well as potential user industries, such as companies specializing in industrial automation, energy, healthcare, smart home solutions, TV manufacturer and PMSE (program making and special events).

Our comments in the following focus on the two WRC-23 agenda items 1.3 (MS 3 600-3 800 MHz) and 1.5 (UHF Review):

2. Comments on the RSPG draft opinion

2.1 Comment on WRC-23 Agenda Item 1.3 (MS 3 600-3 800 MHz)

ZVEI would like to express support for the RSPG recommendation on Agenda Item 1.3. For ZVEI members, it is important to have the possibility to choose between different setups of their networks based on their individual connectivity needs. In case of the 3.5 GHz C-Band this ranges from collaboration with public Mobile Network Operators for using network slices in their nationwide licensed spectrum to independent local networks using ZVEI member's own spectrum licenses.

Several European countries have allowed verticals to obtain spectrum licenses for independent local networks (also in 3600 to 3800 MHz), and the CEPT and EU framework for this frequency range is well implemented. Since the direct access to spectrum licenses for local industry networks is a corner stone to ensure the flexibility for the implementation of connectivity Industry 4.0 solutions, ZVEI fully supports the RSPG recommendation on Agenda Item 1.3 of the World Radio Conference 2023.

Moreover, ZVEI welcomes an upgrade to a primary Mobile allocation in Region 1 with the outlined technical conditions, which will lead to broader harmonization. Local networks are usually limited in range to a dedicated site (i.e. for an industrial plant). Therefore, a licensed approach enables effective coordination and ensures protection of the other services. The use of IMT technologies for Industry 4.0 local networks does not require an IMT identification. Therefore, an IMT identification is not necessary.

2.2 Comment on WRC-23 Agenda Item 1.5 (UHF Review)

The sub-700 MHz band (470-694 MHz) is used in all EU and almost all European countries to provide free-to-air digital terrestrial television (DTT) services to their citizens. The band is shared with Program Making and Special Events (PMSE) which is widely used by the creative industries. Typical PMSE applications include radio microphones and talkback systems.

PMSE applications are essential not only for broadcasters and other content producers but also for cultural, sporting, artistic, political, religious, educational, and civil society organizations. Some of these are significant economic sectors, and all are key components of people's social lives. Wireless PMSE equipment allows great operational flexibility with low production costs. This has resulted in a steadily increasing number of productions and their complexity and, as a consequence, an increasing spectrum demand, especially at large events.

The combined use of the UHF band by DTT and PMSE offers huge public value, and no viable alternative for creating and delivering content as efficiently have been identified. It is therefore critically important to ensure that DTT and audio PMSE continue operating in the UHF band without additional constraints or further reduction of the available spectrum. For PMSE audio services, there is no alternative frequency band with equivalent favourable physical characteristics and capacity.

Technical studies and the experience with the repurposing of the 700 MHz and 800 MHz bands clearly show that sharing between DTT and PMSE and IMT systems such as 4G and 5G is not possible. Any further repurposing of spectrum below 694 MHz for IMT systems would eliminate the current economic and social benefits (including for the environment)[1] of DTT and PMSE.

Therefore, we would like to summarize and suggest the following:

ZVEI supports the RSPG recommendation on AI 1.5.

However, we propose to amend the chapter 4.3.3 "RSPG recommendation" as follows:

"The RSPG recommends that the European Commission proposes an EU position to the Council to ensure that the decision of WRC-23 on this Agenda item is compliant with the Decision (EU) 2017/899 providing priority to broadcasting and PMSE usage until at least end 2030. An IMT identification in this band should be considered outside the scope of this agenda item.

Note: The RSPG is of the view that the above outlined recommendation is ensured by ~~various options. One can be~~ No Change at WRC-23, with a possible agenda item for ~~WRC-27 or~~ WRC-31. ~~Another one can be a co-primary allocation to the mobile service which should become effective at a later stage (e.g. 31.12.2030).~~ It is further noted that the EU Position on this agenda item should avoid ambiguity."

ZVEI: Electro and Digital Industry Association

The ZVEI promotes the industry's joint economic, technological and environmental policy interests on a national, European and global level. The association has more than 1,100 member companies, and 170 employees work in the ZVEI Group.

The sector has round about 879,000 employees in Germany (July 2022). In 2021 the turnover was Euro 200 billion.

The electro and digital industry is the most innovative industry sector in Germany. One-third of the industries sales are based on new products. Every third innovation in Germany´s manufacturing sector stems from solutions of this sector. More than 20 percent of all industrial R+D spending comes from this industry. Every year, the industry spends 20 billion euros on R+D, more than 6 billion euros on investments and two billion euros on training and further education.

[1] DTT in the lower UHF spectrum is a green distribution delivery method. A recent study shows that DTT distribution consumes substantially less energy, when compared to IP-delivered methods, for the delivery of the same content to as many viewers.

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