



Vereniging voor
Experimenteel
Radio Onderzoek
in Nederland

TO:

Radio Spectrum Policy Group – Secretariat
DG CONNECT B4: Spectrum – Office: BU33 7/065
European Commission, B-1049 Bruxelles, Belgium
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Date: 28-11-2019

Subject: Comments on **RADIO SPECTRUM POLICY GROUP, Work Programme for 2020 and beyond (for public consultation)**, work item **Spectrum Sharing**.
(document RSPG19-029 FINAL DRAFT)

https://rspg-spectrum.eu/wp-content/uploads/2019/10/RSPG19-029final-RSPG_work_programme_20_and_beyond.pdf

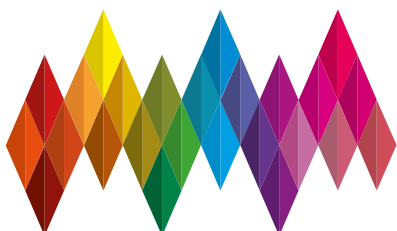
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Reaction of the VERON,

The Vereniging Experimenteel Radio Onderzoek in Nederland (VERON) is a Non-Governmental Organisation which supports experimental radio research within the amateur radio service and amateur satellite service representing the interests of Radio Amateurs in the Netherlands. The VERON is member of the International Amateur Radio Union (IARU). The IARU supports the interests of the amateur radio (satellite) service on a global scale.

The amateur radio service is one of the oldest radio services recognised and regulated by the International Telecommunication Union (ITU) and pre-dates the regulation of radio communications. Having a strong Amateur Radio service has been recognised by Governments not only for the development of technical knowledge but as providing a network of radio stations which is geographically diverse and is able to assist in times of disaster.

The economic importance of having a sufficient supply of trained engineers and scientists within the Union to meet future employment needs and technological development is critical. Amateur radio can provide an introduction to practical engineering, mathematics and physics to youth which directly contributes to a promotion in interest in careers in STEM.



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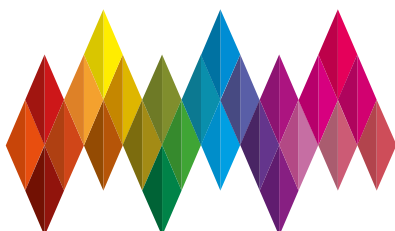
The work program, RSPG19-029, states that various dynamic spectrum sharing options will be investigated. Specifically, this will lead to the roadmap for increased spectrum sharing and identify key pioneer initiatives and bands.

We understand that the identification of these frequency bands among other things will be based on data obtained from long-term measurements of actual spectrum use by software-controlled receivers whose data are stored in databases. With such measurements it is important that the measurement method fits with the actual use of the spectrum, otherwise there is a risk that a piece of spectrum will be identified to be free for sharing while that is not actually the case.

We believe and want to emphasize that it is important to include the characteristics of the relevant radio service into the analysis. This is especially true in the case of the amateur radio service and amateur radio satellite service.

The spectrum use of the amateur radio service is characterized by a large number of geographically dispersed users who perform experiments at unplanned times. As an example on VHF and higher, propagation experiments are dependent on natural radio propagation phenomena. Experiments are also being conducted with innovative modulation methods in which the received signal levels are close to the earthly noise level. Every day experiments are also being conducted with very short reflections in the order of 100 milliseconds. These are examples of spectrum usage that are not directly visible in data on spectrum measurements as mentioned above. The ITU has published a Handbook on Amateur and amateur-satellite services.

The VERON therefore wishes to request RSPG recommend that the special characteristics of the amateur radio service and amateur radio satellite service are included in the analyses of identification of possible bands for sharing. We would like to participate in identifying sharing opportunities and provide the necessary knowledge. We also request RSPG to recommend to exclude the primary allocated frequency bands to the amateur radio service and amateur radio satellite service from the spectrum sharing roadmap.



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