

RE: RADIO SPECTRUM POLICY GROUP **Work Programme for 2020 and beyond** **(for public consultation)**

Thank you for the opportunity to respond to this program; we are active in spectrum activities in CEPT, ETSI and ITU and wish to applaud the proposed sharing activities

First general comments:

future wireless broadband networks

Whilst 5G and similar systems are a requirement for the future they have not made use of much of the spectrum already allocated in that their geographical coverage is insufficient and complete coverage with existing spectrum should be enforced before new spectrum, often to the detriment of existing users and the citizen, is allocated.

Providing sections of the allocated spectrum for “non-network connected systems” as has happened in Germany provide industry with a successful platform for its communications, data and control systems and ensures better spectrum use

Whilst 5G has improvement on 4G, unlike the hype surrounding it, it is not currently suitable platform for many purposes such as PMSE , Broadcast or SRDs which use spectrum efficiently to the advantage of the citizen

A period of stability for other spectrum should be considered until the 5G platform has shown its capabilities commercial viability and weaknesses

Sharing

Currently SRDs are the best example of efficient spectrum use and sharing, a number of bands especially the 915MHz and DECT bands are already under threat from the Railway industry. Whilst SRD are being required to be “state of the art” in their receiver design this does not appear to apply to the rail systems. RSPG may wish to consider these issues and provide protection for the SRD user

Broadcast and PMSE

The 470-862 MHz band in various forms is the backstay of radio microphone and other PMSE devices worldwide, in the region of 80% of equipment will be found in

this band and whilst the current EC proposals protect the remain spectrum 470-694MHz but:

ITU Res 235¹ calls on the regulators and industry “to carry out sharing and compatibility studies, as appropriate, in the frequency band 470-694 MHz in Region 1 between the broadcasting and mobile, except aeronautical mobile, services, taking into account relevant ITU-R studies, Recommendations and Reports.”

The Resolution is unchanged by WRC 19 but the CPM has instigated a Task Group to carry out work prior to WRC 23,

we request RSPG to support this work in line with its policy of retaining use of the UHF TV band until at least 2030

Also, RSPG to clearly identify additional spectrum outside the 470-694 MHz or clearly indicate a reservation of spectrum ideally 30MHz for PMSE within this range.

Industry requires some 5 years to successfully design and build new equipment, a clear indication of RSPG policy would be of great help

In addition the Radio assembly continued work on:

Res 59-2 in its slightly modified form as approved by the Radio Assembly 2019²] “calls for the ITU Director of the Radiocommunication Bureau:

- 1 to develop a publicly accessible webpage to consolidate links to administration lists of ENG information (such as related lists or charts of permitted frequency bands developed by the applicable Study Groups)[...];
- 2 to invite the administrations of Member States to ensure that the information provided is kept up to date by submitting any modifications to the information referred to above on an ongoing basis.”

At a minimum, the RSPG should encourage the EU Member States and the EC to promote similar information as provided by the ECO PMSE webpages and associated Recommendations 70-03 and 25-10 be provided by other ITU Member states. We ask the RSPG to request the member states to actively support RES 59-2 as this industry is steadily growing and extensively peripatetic and generates new jobs, in particular in the new content-driven 5G world.

¹ RESOLUTION 235 (WRC-15): Review of the spectrum use of the frequency band 470-960 MHz in Region 1

https://www.itu.int/dms_pub/itu-r/oth/0c/0a/ROCOA00000C0029PDFE.pdf

² <https://www.itu.int/pub/R-RES-R.59-2-2019>