



Comment on:

Draft RSPG Opinion on the implementation of the current RSPP and its revision to address the next period (RSPG15-621 rev)

SOS – Save Our Spectrum is an initiative aimed at securing the wireless spectrum for the cultural and creative industries. It works to ensure that users and manufacturers of wireless production facilities continue to obtain sufficient frequency spectrum and planning security. Supporters include the Berufsverband Filmtone (Film Sound Professional Association, bvft), the Deutscher Journalisten-Verband (German Federation of Journalists, DJV), the Deutscher Bühnenverein (German Theatre and Orchestra Association), the Deutsche Theatertechnische Gesellschaft (German Theatre Technical Society, DTHG), the microphone manufacturer Sennheiser and the Verband für Medien- und Veranstaltungstechnik (Association for Media and Events Technology, VPLT).

Against this background we comment on the following:

1. We very much welcome that RSPG emphasizes and stresses the importance of PMSE and the need for suitable spectrum.
2. However, we regret that this knowledge has only now found its place in RSPG's opinion after deciding to award 700 MHz band to IMT.

Thereby an irreparable damage has already been occurred for the cultural and creative industries. A lot of productions can no longer be realized in their designated form due to the lack of frequencies. Also big sports events have to accept significant losses or even cannot be financed any longer because not enough TV stations can broadcast. This applies in particular for Olympic Games.



One reason for this development has been “the band by band analysis”. With regard to PMSE this led to fewer frequencies for PMSE because RSPG did not identify new spectrum for wireless production tools simultaneously. The eligible frequencies have been investigated separately and have been awarded to non-PMSE services because RSPG believed PMSE could operate in other bands somewhere.

3. The freezing of 470 – 694 MHz until 2026 by the WRC-15 for TV and PMSE should be used by RSPG to identify suitable spectrum to compensate the losses.
4. In conjunction with the discussion about 5G in the 6 GHz-band and the envisaged revision at WRC-23 of the whole UHF-spectrum (470-960 MHz) RSPG should review to return frequencies between 694 -862 MHz back to PMSE. WRC-23 opens the chance to correct past mistakes.
5. A one-sided orientation towards the alleged needs of more spectrums for IMT harms the culture and creative industry. This is still an industry with the most jobs in Europe.
6. Concerning the demand for more spectra a currant release from Bundesnetzagentur¹ shows that people do not use fiber optic cable (FTTH) because they need not more data capacity. This is a strong indication for WBB.
7. RSPG considers that in the future more services have to share spectrum. For a long time this is practiced between TV and PMSE. Before deciding to share spectrum RSPG should analyse carefully that these services do not interfere and determine which service should have priority.

For this reason the Initiative SOS proposes a detailed status analysis of suitable frequency bands for PMSE before deciding about sharing. First RSPG should analyse the spectrum need of each service and secondly the

¹http://www.bundesnetzagentur.de/cIn_1421/SharedDocs/Pressemitteilungen/DE/2015/151207_Taetigkeitsbericht_PK.html;jsessionid=1C4049CEB6F35C0394C45938FD9B30D3



need for protection. Only than RSPG shall decide which service might share spectrum with PMSE. In this context it does not matter if one service has a primary or secondary status. This distinction serves solely to determine the ranking in case of interferences.

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