

VATM e. V. • Square Ambiorix 13 • B-1000 Brüssel

RSPG Secretariat  
Avenue de Beaulieu 33  
BU33 7/55  
1160 Bruxelles

Durchwahl

+32-2-235 09 80

Datum

05.01.2015

## **VATM comments on the draft RSPG Opinion on the future use of the UHF band (470-790 MHz) in the European Union**

### **General remarks**

VATM, the Association of Telecommunications and Value-Added Providers, represents the interests of 120 pro-competitive companies active in the German market. The VATM welcomes the opportunity to comment on the draft RSPG opinion on a long-term strategy on the future use of the UHF band in the European Union.

We would like to raise the following issues:

In particular, we support the development of a longer-term and forward-looking strategy for the UHF band. As mobile internet traffic will be increasing significantly, we agree with the analyses of the European Commission that pressure will grow on the UHF band since all users have increasing spectrum demands and activities in preparation for a political decision on the UHF band are necessary.

Commenting the German action plan for an auction of frequencies in the 700 MHz band, VATM would like to point out that the auction only shall run when the 700 MHz band will be available. Auctioning the 900 MHz – 1800 MHz band without involving the 700 MHz spectrum will have a negative impact on the market development and the broadband rollout as financial means would be withdrawn from the market unless the 700 MHz spectrum will be made available. It is therefore necessary for planning security to ensure the availability of the 700 MHz spectrum contemporaneously with the other mentioned frequencies.

**Regarding a European strategy on the future use of UHF band in the European Union VATM would like to point out the following two points:**

1. **700 MHz Band:** Its Pan-European availability should be realized in 2020 latest. This does not exclude that in some member states the implementation might take place at an earlier stage. We also support the efforts to improve the trans-border frequency coordination in Germany. The payment targets should be orientated on the basis of the availability of spectrum.
2. **470-694 MHz Band:** It appears that in Germany the use of DVB-T2 is foreseen until the year 2022. As in other countries there might be less use and also an earlier availability. We support the announcement to compile studies assessing the compatibility.

We kindly request you to consider these issues in the further proceeding. Please do not hesitate to contact us for further information as well an in-depth discussion.