

**Draft RSPG Opinion on a long-term strategy on the future use of the UHF band  
(470-790 MHz) in the European Union (RSPG14-585(rev1))**

Comments by the Slovak Republic:

1. Taking into account the fact that WRC 15 has not taken place yet it is not appropriate to draw its conclusions. Therefore it is inappropriate to state that 694 MHz to 790 MHz frequency band will be effectively allocated on co-primary basis to the mobile service.  
We suggest to use the following formulation for the first sentence of chapter 2: *It is expected that after the World Radiocommunication Conference 2015 (WRC-15), the 694<sup>5</sup>-790 MHz ("700 MHz") frequency band will be effectively allocated on co-primary basis to the mobile service alongside the broadcasting service.*
2. We suggest to incorporate chapter 4.1.5 summarising advantages and disadvantages respectively of DTT platform compared to other platforms from consumer point of view. Similar to chapter 4.1.4 summarising regulatory differences between DTT and other platforms.
3. We suggest to add the following bullet to the paragraph related to a timely coordinated release (chapter 7.2.1, 6<sup>th</sup> paragraph): *The adoption of measures preserving the current requirements of DTT (preparation of regional frequency plans)*
4. We suggest to add the following sentence into 4<sup>th</sup> paragraph of the chapter 7.2.2: *The reduced number of DTT layers shall guarantee the preservation of the existing status from the point of view of programme services.*
5. We suggest to replace word “2020” in the first sentence of 8<sup>th</sup> paragraph of the chapter 7.2.2 with the following: *before expiration of existing licences.*
6. We suggest to add the following sentence into the second sub-bullet of the first bullet of chapter 9: *taking into account the current status and objectives of individual member states related to future use of DTT platform.*
7. The chapter 7.2.2 (3<sup>rd</sup> paragraph) states the following: *The RSPG Report on proposed spectrum coordination approach for broadcasting in the case of a reallocation of the 700 MHz band gives an indication that a period of **more than 3 years after WRC-15** would be required to achieve the necessary cross border coordination agreements.* The above mentioned conclusion is not reflected in the timelines set in the 5<sup>th</sup> bullet of the chapter 9. We do not support any fixed deadlines. The deadlines shall reflect situation in individual member states mainly the expiry dates of the current licenses. We would like to emphasise that reallocation of 700 MHz frequency band in the Slovak Republic prior to 2029 (expiration year of the existing licenses) is not viable.

8. In 5<sup>th</sup> bullet of the chapter 9 we suggest to replace the wording “...*to ensure that all necessary cross-border coordination agreements will be finalized...*” with the following wording: *to make an effort to finalise all necessary cross-border coordination agreements at the latest by....* The coordination deadline should be set reflecting the comment no.7 above.
9. In order to synchronize conclusions drawn from responses to the first question in annex 1 with the text in the second paragraph of chapter 4.3 of the main document we suggest to add expression “*of WBB*” between words “implementation” and “might be” in the second paragraph of the summary of responses received to the 1<sup>st</sup> question.