

January 5, 2014

To: Radio Spectrum Policy Group

Secretariat

European Commission

DG CONNECT

B.4 "Spectrum"BU33 07/09

B-1160 Brussels/Belgium

Tel: +32 2 292 12 61

connect-rspg@ec.europa.eu

<http://www.rspg-spectrum.eu>

Re: Call for public input on the draft RSPG Work Programme 2014+

Motorola Solutions (MSI) wishes to thank the EU Commission/DG CONNECT for this first opportunity to comment on the Draft RSPG Work Programme "2014 and beyond" and the continuation of the RSPP 243/2012/EU

In this response MSI will as usual restrict comments to only those which we find relevant to our activities within Europe/EU which constitute Emergency Services (PPDR Sector) and the PMR and Enterprise Mobility segments.

1. Long-term strategy on the future of the UHF band in the EU

This activity seems to be well timed to carry the measures of 243/2012/EU forward into and beyond the World Radiocommunication Conference 2015 (WRC-15) and to prepare the future use of UHF in Europe from 470 MHz to 694 MHz taking into account the growing global convergence of the 700 MHz allocation question, in particular for MOBILE Services.

MSI take the view, that in the longer term the content-streaming concepts (IPTV) emerging globally on the Internet infrastructures including RLAN for high quality video and sound at very high pace will be ported onto mobile broad band networks as well as standardization progresses for commercial as well as Professional PPDR networks. Consequently the trend will be a gradual convergence of the two major radio distribution methodologies ("high power-high tower" and the small cell/spectrum reuse concepts as applied by mobile platforms such as LTE and then possibly LTE-Advanced-UHF)

happening first in the urban areas. This should be taken into account in the development of the “RSPP II”.

The 700 MHz Mandate and medium term considerations

In the medium term the spectrum immediate below 694 MHz is predominantly used by traditional broadcasting (Channel 48) and work is still underway to prepare a European Common Position at WRC-15 for the time beyond WRC-15 regarding this spectral demarcation line and how a medium term inter-service interference can be mitigated here.

MSI welcomes the EU Commission’s initiative to present the 700 MHz Mandate to CEPT and follow and participate in the work. This is however still work in progress but current proposals evolve around a preferred placing of PPDR broad band LTE spectrum as low as possible in the band 694 – 791 MHz subject to result of the work on the 700 MHz Mandate taking into consideration the findings of ECC Report 199 and the further work of ECC FM PT 49 throughout 2014 in particular its forthcoming Report .

Conclusion on the RSPG Plans under 1.

We welcome the RSPG plans to: *“Develop a long term strategy for the UHF band 470 MHz – 694 MHz including **a realistic vision** for the DTT platform in the context of various technological evolutions.....”* and to

“Assess the possible implementation of WBB in the 700 MHz band in the EU, on the basis of the output of the current EC mandate 700 MHz, and develop relevant recommendations, also in the light of international developments.”

2. WRC-15 preparation (common policy objectives for WRC-15)

As the RSPG is planning to offer guidance to MS in developing ECP’s we shall in particular focus on the ECP for WRC-15 AI 1.3 which the CEPT is elaborating in the CPG PT A.

As we take note, that AI 1.3 calls for the review and revision of ITU-R Resolution 646 (Rev WRC-12) it is observed that 243/2012/EU is already offering guidance hereto by its provisions of Article 8.3:

“The Commission shall, in cooperation with the Member States, seek to ensure that sufficient spectrum is made available under harmonised conditions to support the development of safety services and the free circulation of related devices as well as the development of innovative interoperable solutions for public safety and protection, civil protection and disaster relief.”

Both the EU Commission and many MS are indeed living up to the (binding) provisions of this Article, by actively participating in the proceedings of the ECC FM PT49, which *inter alia* has identified the spectrum range of 694 – 791 MHz (the 700 MHz range) as a candidate range for PPDR mobile broad band and as such is an immediate candidate for the revision of Resolution 646, which already for Region 1 has the range 380 – 470 MHz listed for narrow and wide-band PPDR communication services.

As a result of this revision of Resolution 646 nations of Region 1 (and entire EEA) are encouraged from within the 700 MHz range to allocate spectrum entirely according to national circumstances for PPDR broad band LTE Services whilst EU MS are in full alignment of the RSPG Sectoral Report's conclusions for broad band PPDR.

Conclusions of the RSPG Plans of section 2

With the encouragement to RSPG to take into account our comments above related to bullet number two below, MSI is agreeing with these draft plans.

- *Assist the European Commission in formulating EU Common Policy Objectives;*
- *Offer guidance to Member States in developing ECPs; ECPs (e.g. distinguishing between European and global spectrum needs)*
- *Identify actions for the European Commission in order to provide political support to promote common policy objectives in regular meetings between EC and non-EU countries*

3. The review of the Radio Spectrum Policy Programme (RSPP I)

In order to safeguard a future spectrum environment for broad band PPDR under harmonized conditions in the meaning of 243/2012/EU, Article 8.3, MSI propose to carry this article over into a "RSPP II" 2015 – 2020 , subject to the review of the progress/state of affairs covered by this article and the outcome of WRC-15.

Yours respectfully

Steffen Ring, M.Sc.E.E.

Senior Director

Government Affairs

steffen.ring@motorolasolutions.com

Mobile: +45 4025 1881