



PSCEurope

**PSC-EUROPE/029-2013**

**PSCE response to the Radio Spectrum Policy Group (RSPG) draft  
Work Programme "2014 and beyond"**

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PSCE response to the Radio Spectrum Policy Group (RSPG) draft Work Programme  
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## **PSCE response to the Radio Spectrum Policy Group (RSPG) draft Work Programme "2014 and beyond"**

Public Safety Communication Europe Forum (PSCE) is a permanent autonomous organisation aiming at improving provision of public safety communications and information management systems and the safety of the citizens during crisis and emergency situations. PSCE provides a unique common platform for researchers, industry and users enabling regular exchange of ideas, information, experiences and best practices.

In reference to the public consultation issued by the Radio Spectrum Policy Group on 18 November 2013, PSCE would like to hereby present the following comments and amendments on the RSPG Work Programme ("WP 2014 and beyond").

### **General comments**

1. PSCE welcomes the draft proposal of the RSPG and wishes to highlight the need for spectrum for Public Protection and Disaster Relief (PPDR).
2. In spite of the fact that the European public safety forces are actually using the radio spectrum quite efficiently already today, there is still a growing need for the spectrum not only during the big crisis but also day-to-day activities.
3. The harmonised spectrum for PPDR purposes would boost industrial sector contributing significantly to the European innovation, product development and equipment supply. Availability of radio spectrum is naturally a key enabler to this business for instance in the context of a cross border cooperation. We believe access to coordinated spectrum for PPDR would support the free movement of such services across Member States' borders, to the benefit of all EU citizens and in compliance with the treaties.
4. From the point of view of the public safety services it is clear that the services have to be provided efficiently in a nationwide scale without having "underserved areas". For example emergency medical services have to be organised for everybody potentially needing those services "some day somewhere", and the same is true for the communication facilities needed for provision of those services.
5. Assumptions that dedicating spectrum to PPDR organisations exclusively might result in underutilisation of this portion of spectrum, can be mitigated. Spectrum sharing arrangements can ensure optimum use of spectrum, but PPDR and other critical communications need to be in control of the sharing mechanism, so that the users have guaranteed access to spectrum in order to continue to provide the best possible service to the citizens.

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Amendment 1

**RSPG13-543 (Annex 1)**

**Efficient awards and use of spectrum bands harmonised for Electronic Communications Services (ECS) / Scope of RSPG activity:**

*Text proposed by the RSPG*

“The RSPG plans to assess regulatory feasibility (e.g. using spectrum sharing, pooling) of key requirements of WBB systems (e.g. with larger bandwidth than 5/10 MHz) in different usage scenarios including both urban and rural areas.”

*Amendment*

“The RSPG plans to assess regulatory feasibility (e.g. using spectrum sharing, pooling) of key requirements of WBB systems (e.g. with larger bandwidth than 5/10 MHz) in different usage scenarios including both urban and rural areas **while taking into consideration also PPDR requirements.**”

**Justification**

PPDR services are developing with technological change, which means that communication services require increasing spectrum, e.g. for imaging and data exchange. As public broadband risks being disrupted in crisis conditions, a dedicated and harmonised allocation of spectrum for PPDR services is needed to ensure its uninterrupted full functioning.

Amendment 2

**RSPG13-543 (Annex 1)**

**Efficient awards and use of spectrum bands harmonised for Electronic Communications Services (ECS) / Scope of RSPG activity:**

*Text proposed by the RSPG*

“In this activity workshop(s) could be organized to collect views from industry on the future usage of ECS bands based on technological developments.”

*Amendment*

“In this activity workshop(s) could be organized to collect views from industry **and other relevant associations** on the future usage of ECS bands based on technological developments.”

### **Justification**

Membership-based associations, international forums and non-profit associations which are representing other than purely industry-driven views, may also share their expertise and provide important input to these discussions.

Amendment 3

**RSPG13-543 (Annex 1)**

**“Good offices” to assist in bilateral negotiations between EU countries**

*Text proposed by the RSPG*

“The RSPG would request a representative of a Member State, not directly involved and agreed by concerned parties, to chair a working group addressing the matter. This group should investigate the coordination or harmful interference issue and propose a balanced approach or solution to the concerned countries.”

*Amendment*

“The RSPG would request a representative of a Member State, not directly involved and agreed by concerned parties, to chair a working group addressing the matter. This group should investigate the coordination or harmful interference issue **especially for the safety and security purposes** and propose a balanced approach or solution to the concerned countries.”

**Justification**

Natural disasters and terrorist threats do not respect EU Member States borders, as fully recognized by the European Council of Justice and Home Affairs Ministers in its June 2010 Recommendation 10141/09 on “*Improving radio communication between operational units in border areas*”. As a result, there is a need for emergency response organisations to communicate with each other efficiently and quickly.