

RSPG Secretariat

office BU33 7/55

Avenue de Beaulieu 33, B-1160,

Brussels, Belgium

BY EMAIL: CNECT-RSPG@ec.europa.eu**RE: REPLY TO THE Questionnaire on Long-term vision for the upper 6 GHz band by the České Radiokomunikace a.s. company**

Date: August 19, 2024

Place: Prague, Czech Republic

České Radiokomunikace a.s., company ID 24738875, headquartered at Skokanská 2117/1, Břevnov, 169 00 Praha 6, Czech Republic, registered in the Commercial Register of the Municipal Court of Prague under file no. B 16505 (hereinafter “**CRA**”) is the leading operator of digital terrestrial networks for television and radio broadcasting and the main provider of a wide portfolio of digital infrastructure and telecommunication services in the Czech Republic.

CRA is one of the biggest operators of fixed services in the upper 6 GHz band in the Czech Republic who currently operates more than one hundred point-to-point links across the whole area of the Czech Republic. These links are most often used for transition of telecommunications services, radio and television distribution (both public and commercial media services) to high power TV and radio transmitters (DVB-T2, DAB+, FM), data connection of mobile networks base stations and provision of telecommunication services for Czech public authorities including Public Protection and Disaster Relief over long distances (even more than 40 kilometres), incl. localities where fibre connection is not available, either for geographical or economic reasons (such as rural areas or protected landscape areas).

Upper 6 GHz band is one of the most crucial bands in the Czech Republic and it is extensively used for provision of telecommunication services which also secures connectivity to transmitters of the critical infrastructure. Many of these point-to-point long-haul links are currently irreplaceable due to high economic costs of deployment of fibre networks or costs associated with replacement of infrastructure caused by migration of links into another frequency band which is not even possible in many cases. Migration into other frequency bands is however unlikely as neighbouring frequency bands are also currently extensively used and they do not have sufficient capacity in exposed locations.

Deployment of Mobile/Fixed Communication Networks and/or Wireless Access Systems and Radio Local Area Networks in the upper 6 GHz band is therefore strictly limited in the Czech Republic at least until 2030, i.e. in the term of expiration of individual authorizations issued to telecommunication operators and internet service providers by national regulatory authority – Czech Telecommunication Office.

Future spectrum needs will depend mainly on the degree of availability and coverage of fibre networks which can effectively substitute point-to-points links with regard on business-driven recovery plan of technologies used by each infrastructure service provider. Any accelerated and forced release of frequency band would also increase costs for securing this process.

As there is no complete substitution for point-to-point links in other bands or technology, deployment of any other telecommunication services in the upper 6 GHz band would cause interference of current incumbent services. Therefore, any release of new telecommunication services in the upper 6 GHz band may only be enabled under circumstances that these services will not interfere provision of incumbent services, e.g. new services (i.e. WAS/RLAN) will be limited for indoor use or in locations where point-to-points links will be in the future (beyond 2030) already fully migrated from the upper 6 GHz band naturally.

With respect to the current use of the upper 6 GHz band, CRA strongly prefers to keep existing allocation of that frequency band at least until 2030 to preserve available frequency spectrum for important and priority telecommunication services secured by point-to-point microwave links and protected against interference.

We hope that you will use our information for the preparation of the final Long-term vision for the upper 6 GHz band.

Best regards,

České Radiokomunikace a.s.
Marcel Procházka
Director of legal and regulatory affairs