

Comments on

DRAFT RSPG OPINION ON EU SPECTRUM POLICY IMPLICATIONS OF THE DIGITAL DIVIDEND

Dear Sir or Madam

Some months ago a working team of the DKE 'German Commission for Electrical, Electronic and Information Technologies of DIN and VDE' was established in Germany to examine the extensive factual issues concerning the use of the UHF-frequency range through 'Professional Wireless Microphone Systems' - PWMS.

The work of this team is based on a program of three steps:

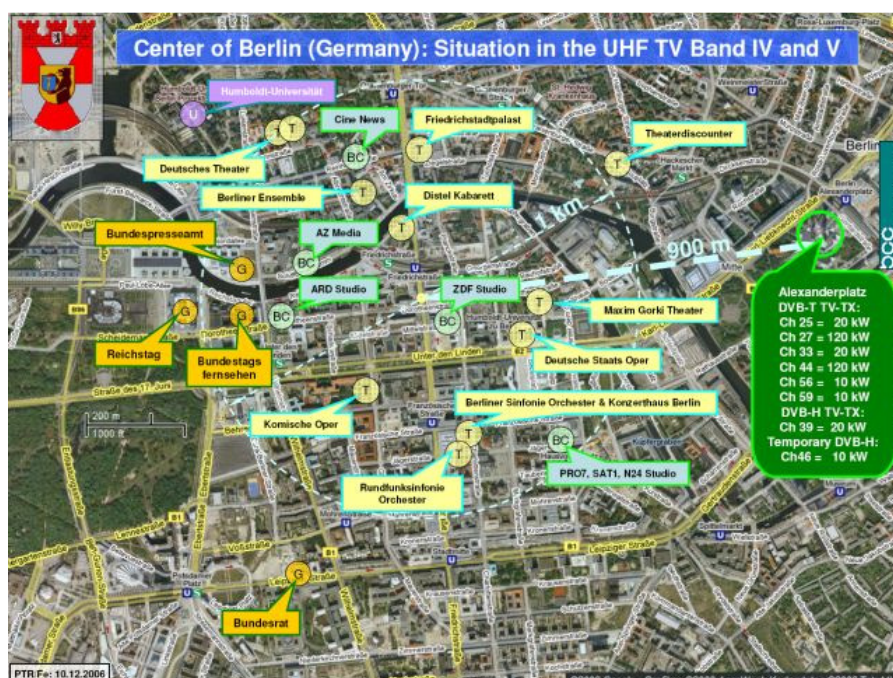
1. Description of the application within an SRDoc

This step of work was realized by support of the ETSI TG17WP3. The document 'Draft_TR_102546v010101_1.0.1.doc' has properly gone through the ETSI process and will be forwarded to the CEPT. Please do consider this document for your work.

2. Determination of the necessary frequency resource in maximum and average unit density

In order to precise the work results questionnaires were sent to PWMS users in many European countries. So far application descriptions with about 11700 PWMS can be documented. Although the inquiry has not been finished yet, we can already recognize that the integration profundity in the UHF TV band is much bigger than expected. It is safe to assume that in Europe there are more than one million (a much higher number is also possible) PWMS are being used.

At present a first application hot spot 'Berlin-Mitte' is being evaluated. Although not all the data have been completely evaluated yet, we can already predict, that in a diameter of 1 km at least 180 PWMS are in daily use. This unit density is increased by a large number of extern PWMS e.g. by 'News gathering' - ENG. With pleasure we will be willing to place to your disposal the present state of work on this hot spot:



The description of further European hot spots will follow.

At present a temporary working team of users, manufactures and experiences is being made up to work on the basis of the collected application data. This team is supposed to supply sound statements to the necessary frequency spectrum resource.

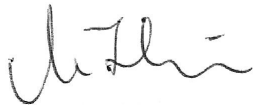
3. Management methods of the usable frequency spectrum resource

This step of work will be started in 2007.

In some countries the advantages of the 'Digital Dividend' are strongly being discussed nationally. We are quite worried about noticing that there might be a discussion which is not based on sufficient portrayal and modelling of the practical situation. We know that in few cases there are heated discussions with PWMS users who fear risks for their base of work. Please do for instance consider the current discussions between OFCOM and the BEIRG group in the UK.

We notice that the PWMS users are more and more getting worried about the future base of their work. We kindly ask you to consider these worries very carefully!

Yours sincerely



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