



Radio Spectrum Policy Group – Secretariat
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RESPONSE TO DRAFT RSPG OPINION ON COMMON POLICY OBJECTIVES FOR WRC-15

DNA Ltd (DNA) welcomes the opportunity to comment on the Draft RSPG Opinion on Common Policy Objectives for WRC-15. DNA provides network services with both mobile communications and terrestrial broadcast networks, therefore DNA's point of view is converging co-existence of both platforms and is focused on agenda items 1.1 - 1.3.

1 DRAFT RSPG Opinion on Common Policy Objectives for WRC15

1.1 WRC-15 Agenda Item 1.1

RSPG recommendation that the frequency band 470-694 MHz shall remain available for DTT in the foreseeable future, i.e. 2030 is contradictory to RSPG article 3 where fostering access to broadband at a speed of not less than 30 Mbps by 2020 for all Union citizens is a priority. It is a well-known fact that only spectrum below 1 GHz can effectively foster WBB in sparsely populated rural areas. We encourage RSPG to acknowledge that it is not possible to foresee and lock the future of the most valuable spectrum for fifteen years in an area where technology and needs of the citizens are evolving in accelerating pace. Instead, in our opinion RSPG should have a broad-minded point of view and should promote co-primary allocation for WBB as a flexible and future-proof solution that fulfills needs of the EU citizens.

DNA proposes that RSPG recommendation to member states: *“support no mobile allocation in the band 470 – 694 MHz”* is removed and replaced by recommendation: “support co-primary mobile allocation in the band 470 – 694 MHz”

1.2 WRC-15 Agenda Item 1.2

We think that RSPG should soften recommendation: *“support 694 MHz as the lower edge for the allocation to the mobile service on a co-primary basis with the broadcasting service and identification for IMT in the 700 MHz band, while ensuring protection of the broadcasting service below 694 MHz,”* to more liberal and open-minded view towards ongoing technological and behavioral shift from broadcast to individually received and consumed AV content. RSPG should acknowledge that one-sided protection of legacy broadcasting cannot be justified and evolution towards WBB services should be considered as an optional path to digital convergence.

DNA proposes that the abovementioned recommendation is revised to: “support 694 MHz as the lower edge for the allocation to the mobile service on a co-primary basis with the broadcasting service and identification for IMT in the 700 MHz band, while maintaining broadcasting service below 694 MHz together with provision for WBB co-primary allocation in the band 470 - 694 MHz”.



1.3 WRC-15 Agenda Item 1.3

It is very important that RSPG is determined in its opinion that any action at WRC-15 reflect that PPDR related radio communication matters are an issue of sovereignty of each Member State. And consider future harmonization of PPDR only if the action is flexible enough to consider national differences in spectrum requirements for PPDR services, as well as the national choice how to provide these services, which may be through a dedicated PPDR network, commercial networks or a hybrid solution (mix of dedicated and commercial networks).