

## **RESPONSE TO RSPG CONSULTATION ON THE DIGITAL DIVIDEND OPINION**

The undersigned three associations, two public safety radio network operators and six radio manufacturing companies want to thank for the opportunity to respond to the RSPG Opinion on Digital Dividend by providing their joint views below. As it has been said many times the Digital Dividend when properly utilised will offer a once-in-lifetime opportunity to improve and enrich the mobile service access possibilities of consumers, businesses and also various functions of the society if so decided.

The undersigned organisations represent users and providers of mission critical radio communication services and tools from public safety agencies to other critical infrastructures and industrial users. One of our main concern recently has been how to ensure that the next coming ICT services and applications will be reliably accessible to the workforce in the field when the competition on radio spectrum resources is making radio frequencies both harder to find and also more expensive to the professional users like government departments whose funding comes from the taxpayers. The ongoing dialogue on the Digital Dividend has been seen as a possibly important vehicle towards satisfactory solutions.

Some representatives of the Public Safety community were invited to attend the Commission hearing on the Digital Dividend in early March this year and delivered common views on how the mission critical field operations will become increasingly dependent on computers and ICT solutions that have to be extended out to the field to improve both operational efficiency and officer safety while keeping operating costs at acceptable level. The attendees also re-iterated the opinion that the nature of mission critical operations require that the key applications are provided by medium that is reinforced to maintain full service capability also during accidents, incidents and disasters of any nature. We fully share those views.

The undersigned organisations strongly suggest that the needs of the mission critical radio users are kept in consideration while making decisions concerning future use of UHF radio frequencies. We do not insist that the frequencies should be found inside the 790 to 862 MHz band itself if that turns out to be impossible, the exact frequencies are after all less important than finding a technically and economically feasible solution. The ongoing dialogue on Digital Dividend would be an excellent occasion to consider and evaluate also the needs of mission critical users and consequently take the needed actions on political level to move the issue forward towards practical decisions on administrations level.

Expert bodies such as ETSI and the Police Cooperation expert group have concluded that the future spectrum for public safety and security should be located below 1 GHz to be economically feasible as listed below. The list also

shows that the need for new dedicated radio spectrum for mission critical radio applications has been duly recognised by ETSI, ECC and also by the Council of the EU.

1. Studies done within ETSI in preparation of a System Reference Document for new radio spectrum to meet the needs of future mobile data services for Public Safety agencies concluded that some 2 x 16 MHz of new spectrum below 1 GHz would be needed to satisfy those needs. A draft version of the document (ETSI TR 102 628) was submitted to ECC/CEPT already in 2008 and initiated related studies in ECC.
2. As part of the studies in ECC the ERO conducted a questionnaire to radio administrations, radio users and industry in early 2009 to quantify the need for new radio applications and corresponding radio spectrum. When analysing the collected responses from total 52 organisations the ECC WG FM concluded in May 2009 e.g. that
  - Usage of mobile data in Public Protection and Disaster Relief (PPDR) is increasing rapidly
  - Mission critical data applications need a dedicated radio system, while some other applications can be run also in commercial mobile networks
  - The increased usage of data justifies the request for new radio spectrum
3. Recently approved (Justice and Home Affairs) Council Recommendation (10141/09) on improving radio communication between operational units in border areas concludes that law enforcement and public safety radio communication systems will need to support and to be able to exchange high speed mobile data information beyond the capabilities of current networks, and a common standard operating in a harmonised frequency band will make this possible. Consequently the Recommendation suggests that the ECC should be tasked to study the possibility of obtaining sufficient additional frequency allocation below 1 GHz for the development of future law enforcement and public safety networks.

To summarise, the undersigned organisations propose that the Commission keeps the needs of the public safety community on the agenda when proceeding with the Digital Dividend and initiates needed measures to have a harmonised spectrum identified for future PPDR services within the range 300 MHz to 1 GHz. Further we propose that the Commission will find means to encourage the member states to adopt policy that will enable the PPDR organisations to have access to new spectrum at a cost that is reasonably within the limits of their budgetary resources.

We are happy to expand our views by discussion or correspondence in case there is need for further clarification. The signatories can be reached via the

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