

Organisation: Federal Office for Civil Protection FOCP

The Federal Office for Civil Protection (FOCP) operates and coordinates the development of secure communication networks for Swiss rescue and security authorities and organisations and planned the necessary work in connection with the required frequency spectra together with the Federal Office of Communications (OFCOM).

Due to its central location in Europe, Switzerland is stakeholder in frequency usage agreements for the border area with its neighbours Germany, France, Italy, Austria and Liechtenstein in the area of security communications.

Switzerland has the security lead for VIP visits of the European Organization for Nuclear Research - CERN (ministers from countries all over the world), collaborates with and reinforces CERN's fire brigade and first responders. CERN and Switzerland are close partners who have implemented joint solutions for their PMR radio networks.

As a preamble, we would like to thank you for giving us the opportunity to express our position statement on the "strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU".

Position statement :

§3.3.3, page 12, fourth sub-§:

The wording is too vague with no precise figures at all, we kindly ask you to replace "... Where the entire 470-694 MHz band is intensively used for DTT service, as it happens in a number of Member States in Europe,..." by "... Where the entire 470-694 MHz band is used for DTT service, as it happens in some of Member States in Europe,..." as this would not alter the meaning.

We also kindly ask you to delete the following sentence at the end of the sub-paragraph: "Therefore, the use of the FDD 600 MHz band plan is not expected to be implemented throughout the European Union." because this latter would exclude the 600 MHz band where broadcasting is or will be phased out. A large part of Europe has also moved towards cable IPTV and its deployment keeps going. Moreover dynamic frequency planning and assignation is an enabler for solving any eventual conflictual use (borders, coast, tunnels, etc.).

We also emphasize that EU is entitled for security/safety on its territory, hence has a duty to actively support PPDR needs, this also applies to Switzerland. The support of the PPDR must be strong. As mentioned in the drafted document information, culture or cultural events are very important to be broadcasted, however those events are also extremely demanding for Swiss PPDR (BORS/BOS) and emergency situation analysis (data) and voice services are a must for governments/authorities/medical staff. It should be pointed out that emergency situation cause impacts on **regional or countries' economies** when there is no efficient PPDR system.

Non-exhaustive examples: Football championship events; Natural catastrophes; religion gathering; heat-wave in South-Korea world international Scouts event (Jamboree) with emergency/ dispatch of health professionals, then evacuation due to typhoon; etc.

- Heat waves and fires across Europe
- "In an attempt to "save" the scouts' festival, the South Korean government has rushed military doctors and nurses to Saemangeum, near Buan, in the north of South Korea. " - Translated from ats article
- "The announcement about the evacuations came after the World Organization of the Scout Movement said it called on South Korea to quickly move the scouts from the storm's path and "provide all necessary resources and support for participants during their stay and until they return to their home countries." - Apnews.com article

We have also drawn inspiration from a number of relevant points in the TCCA position paper, such as: For many PPDR agencies, especially those in Europe, there is an urgent need to secure additional sources of harmonised PPDR broadband spectrum to augment current systems and/or ensure the successful migration from narrowband to mission-critical broadband, independent of local market conditions (i.e. avoidance of market failure). New broadband PPDR technologies will support interoperability and seamless connectivity with legacy narrowband systems. Spectrum needs for broadband are additional and complementary to that already used for narrowband.

Moreover, TCCA highlights the importance of the consideration for a compatible 600 MHz band plan (i.e. 3GPP bands 71 and n71) for such implementations in order to protect spectrum already in use^[1] by some PPDR agencies in Europe

^[1] FM(23)002rev1 WG FM questionnaire to CEPT Administrations on the availability of spectrum for BB-PPDR <https://www.cept.org/ecc/groups/ecc/wg-fm/client/meeting-documents/file-history/?fid=74674>

Other countries with a heavier use of DTT can also technically free up the required spectrum by introducing changes in their network topology with an increasing use of Medium Power Medium Tower (MPMT) and Low Power Low Tower (LPLT) deployments.

Regarding the coexistence of Broadcast and Mobile Service, TCCA would like to point out that the protection distances considered in the RSPG Strategy do not take into account the use of new broadcast technologies such as 5G Broadcast or the use of other network topologies such as MPMT/LPLT. Therefore, new compatibility studies are required for re-assessing under which conditions both radio services can coexist.

On the one hand, the severity and regularity of natural disasters that PPDR organisations have to fight are increasing due to climate change; this is driving also the requirement for more energy efficient technologies.