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To

Members of the Radio Spectrum Policy Group

Via E mail :CNECT-RSPG@ec.europa.eu

Public Consultation on the Draft Opinion on Strategy on the Future use of the frequency band 470-694MHz beyond 2030 in the EU

Comments from the European Confederation of Police (EuroCOP) 23rd August 2023

Dear Sir/ Madam,

EuroCOP is very pleased to have the opportunity to take position in the ongoing consultation process on the draft RSPG opinion on strategy, on the future use of the frequency band, 470-694 MHz beyond 2020 in the EU

Please find our official comments in the appendix

Yours sincerely

A handwritten signature in black ink, appearing to read "Nigel Dennis", with a long, sweeping horizontal line extending to the right.

Nigel Dennis

Head of Office

European Confederation of Police

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EuroCOP Official Comment

on the Draft RSPG Opinion on the Strategy on the future use of the frequency band 470-694 MHz beyond 2030

Preliminary remarks

The European Confederation of Police (EuroCOP) is the umbrella organisation for police unions and staff organisations in Europe.

Based in Luxembourg, we represent the interests of police officers across the whole of the European landscape.

EuroCOP is tackling issues from police cooperation across borders to a safer working environment for police officers on the street. We are determined to contribute to European policy debates and provide added value by giving a practitioners perspective.

We are therefore pleased to have the opportunity to take a position in the ongoing consultation process on the Draft RSPG Opinion on Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU. As key stakeholders in this debate, we are aware of the importance of the decisions to be taken at European level for the smooth and crisis-proof functioning and operational capability of the administrative institutions as well as the authorities and organisations with security tasks.

To be able to handle missions, such as terrorist attacks or natural disasters, in the best possible way both now and in the future, and also to cope with increasingly complex digital communication, police forces require their own mobile and highly available broadband network. This enables the transmission of large amounts of data within the shortest time periods, as required in critical operations.

The requirement for this is an additional frequency band in the range of 470-694 MHz. It would also be possible to expand the network for the police forces in this area in a timely and economical manner. In contrast, it is not possible to switch to commercial mobile radio infrastructures, as they are not equipped for crisis and disaster situations and would not offer digital sovereignty for mission-critical voice and data communication.

From our point of view, the additional frequency band is indispensable for the police to

perform their sovereign tasks. For this reason, we demand the joint use of the UHF band for the authorities and organisations with security tasks in the 470-694 MHz frequency band from the year 2031.

Unless that UHF frequency band is opened up for police forces in all EU countries, there would be a serious risk that it would no longer be possible to guarantee the operational management and functionality of the police forces and that the maintenance of public safety and order would be ultimately threatened.

Core of EuroCOP comments

We regret that the report available for consultation does not at any point adequately take into account the need for the UHF band which is necessary for police forces. In none of the three scenarios outlined are the so-called Public Protection Disaster Relief (PPDR) units, which include police forces, allocated their own frequencies. This is also reflected in the recommendations that the PPDR should only be allocated frequencies at national level if those are no longer needed for broadcasting or event technology.

In the light of the above, we do not believe that the drafted strategy can be approved. The Radio Spectrum Policy Group (RSPG) should not recommend a report to the European Commission that fails to recognise the urgent need for explicit consideration of police forces in the future allocation of frequencies. In this respect, our appeal is to improve the situation accordingly and to make the frequency band usable and accessible for PPDR.