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RSPG Secretariat

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

This statement contains no secrets. It may be published in its entirety.

Dear RSPG Representatives,

thank you for the opportunity to comment on the RSPG consultation.

We appreciate the work of the RSPG as an independent body to assess spectrum issues in the EU.

The initiative "SOS - Save Our Spectrum" represents the interests of PMSE users in Europe.

In three campaigns in 2022 and 2023, called "Call to Europe", with at last 100 supporters from 24 countries from all parts of Europe, we made clear that PMSE is dependent on the use of the frequency band between 470 and 694 MHz also after 2031.

In this context, the cooperation with broadcasting, which has worked very well in the past decades, is essential for us. **We therefore advocate that broadcasting and PMSE continue to share the frequency band, at least until June 30, 2042.**

This can be done, as in the past, in good cooperation with radio astronomy, meteorological services and the military. The needs of other interested parties can be satisfied in other bands (IMT in the GHz range, PPDR has expressed interest in the band in only one EU member state).

We would like to emphasize that PMSE will need additional UHF-spectrum in the future, especially from 2025 or 2030 at the latest. The demand already exceeds the possibilities today. Several events recently experienced frequency problems

due to lack of sufficient spectrum. Let me remind you of the festivals Lollapalooza 2022 in Berlin and Digital X 2022 in Cologne.

We would like to emphasize that in your consultation draft you describe actual problems that are a major issue for the cultural industries:

Scenario 3 /page 17:

"This would also mean that the national solutions for the PMSE usage in this band may be in place, though less spectrum will be available. The coordination efforts needed for this scenario may be challenging, depending on the overall situation. Complexity may remain at the border of EU for implementing this scenario."

"Scenarios 2 and 3 would probably develop differently by each country implementing them, depending on the national spectrum needs for broadcasting, PMSE or other uses, as well as on cross border coordination, needed in case of different usage scenarios in neighbouring countries. These scenarios would require high-engagement from the Administrations involved."

We would like to emphasize that so far we have a single European market for PMSE. This makes it possible to conduct tours through different countries. There are also few problems at borders.

The scenario you describe as challenging for regulators would be a disaster for us as PMSE users. Different usable frequency ranges in different countries are difficult for us. That means we have to buy different equipment. We need a harmonized frequency range in Europe - as nowadays - for PMSE and preferably also for broadcasting.

Our daily needs are at least 120 MHz anytime and anywhere, and 220 MHz for festivals, sporting events, political events like elections, etc. For major events, the need increases even more. These needs must be satisfied in the UHF spectrum. Other frequency bands are difficult to use for technical reasons. In addition, demand is also increasing overall, as there are more and more events.

Due to the decisions of the last few years, we have lost a great deal of frequency band. Now there must be no more losses. On the contrary, we need bands back again.

About this statement, we agree:

page 18:

However, the spectrum available for audio PMSE has been reduced, fallen almost to the half, due to the release of the 700 MHz and 800 MHz Digital Dividends. Beyond the above scenarios, it is expected that the demand for spectrum for PMSE applications will increase in order to cope with the growing content production, and therefore access arrangements will have to be found to ensure sufficient spectrum for PMSE.

About this statement, we have to warn regarding the last half-sentence:

page 19, point 6

RSPG recommends that those Member States introducing other usages than broadcasting, should preserve sufficient spectrum for PMSE needs, taking also into account the transition of PMSE towards new spectrum efficient technologies.

Under no circumstances should the spectrum for PMSE be cut because of the vague hope that new technologies could emerge. These technologies are not yet on the market. Even if they existed, they are not suitable for all events. First of all, the introduction of a new technology means that more spectrum is needed for PMSE.

The hope that the new possible technology from a single manufacturer is the solution for PMSE is deceptive. The spectrum requirement also increases independently of this.

We would like to point out that in the USA many events are no longer possible in many places due to the loss of frequency in the past. Elsewhere, sound engineers make do with spectrum allocated for IMT but not yet implemented there. In any case, "American conditions" must be prevented in Europe, especially since we have a much denser network of cultural institutions.

Europe is a cultural Europe, or no Europe at all.

Without cultural frequencies, which - as before - are harmonized thanks to broadcasting, Europe will fall apart into its individual parts.

The question will then be why Europe is actually still needed.

With best regards

Jochen Zenthöfer

Speaker

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