

## Comments on the Radio spectrum policy programme

Latvian administration welcomes work that has been done to carry out the first Radio Spectrum Policy Programme by Radio Spectrum Policy Group.

Latvia also recognizes the importance of the first Radio Spectrum Policy Programme as a tool to set out common European policy orientations and objectives for the strategic planning and harmonisation of the use of radio spectrum.

However, we believe when deciding about terms and ways of use of the 800 MHz dividend spectrum due account should be taken on local circumstances and differing conditions in each Member State depending on its location, actual use of the band and cross-border use in neighboring non-EU countries with an objective to reach higher efficiency and benefits for the society and economy.

In third countries bordering with Latvia and with other Baltic States the 800 MHz band is used by a sensitive aeronautical radio navigation service. A later switch-off of analogue television – 17 of June 2015 in compliance with the GE06 agreement – is scheduled in Russia and Belorussia. Resulting from that the implementation of Geneva 2006 plan in Latvia with full characteristics will become available only after 17 of June 2015.

Results of cross-boarder coordination with EU Member States and third countries are essential when deciding on optimal terms for restructuring of the band.

Therefore Latvia does not consider setting a unique mandatory term for all Member States when making the 800 MHz band available for services other than broadcasting as appropriate but leading in some extent to lower efficiency of use of this band in certain Member States, at least for certain time. Taking this into account we strongly believe that the possibility that a postponement could be necessary in some specific and justified cases should be reflected in the main text of the RSPG Opinion on the Radio Spectrum Policy Programme.