

April 30, 2013

Consultation response to the “Draft RSPG Opinion on Strategic Challenges facing Europe in addressing the Growing Spectrum Demand for Wireless Broadband”

by

Motorola Solutions Inc

Introduction

Motorola Solutions (MSI) wishes to thank the EU Commission and the Radio Spectrum Policy Group for the opportunity to submit comments to this draft opinion.

As an active participant to the Commission’s Workshops on European Spectrum challenges we wish to take this opportunity to share our spectrum expertise derived also from our involvement in the work of the many relevant groups of ITU-R (including World Radio Conferences) and CEPT/ECC Working Groups.

For the purpose of this consultation response MSI is limiting its comments to cover the 700 MHz band only.

Some key 700 MHz Band aspects

Sectoral Spectrum Needs- PPDR

Whilst the draft opinion is mentioning the PMSE needs, the need for Mobile Broad Band Services to the PPDR (Public Protection and Disaster Relief) Sector seems to be forgotten even though it is another prominent Sectoral Spectrum stakeholder.

We have taken note that the Commission’s Mandate to CEPT on the 700 MHz band is duly recognizing the requirements for Broad Band PPDR and that the RSPP Article 8.3 states that:

“The Commission shall, in cooperation with the Member States, seek to ensure that sufficient spectrum is made available under harmonised conditions to support the development of safety services and the free circulation of related devices as well as the development of innovative interoperable solutions for public safety and protection, civil protection and disaster relief.”

As a result of these observations, MSI would like to submit some further comments on:

WRC-15 aspects

MSI take note that the draft opinion is not mentioning the significance for PPDR of the WRC15 Agenda Item 1.3, which is dealing with the updating of Resolution 646: *“to review and revise Resolution 646 (Rev.WRC 12) for broadband public protection and disaster relief (PPDR), in accordance with Resolution 648 (WRC 12)”*.

Recognizing that:

- 1) CEPT/ECC PT1 has been identified as the responsible entity for developing the response to the Commission’s 700 MHz Mandate to CEPT and
- 2) the ECC CPG PT A is tasked to develop the CEPT Brief for AI 1.3 and the subsequent ECP,
- 3) the ECC WG FM Project Team FM PT49 on BB PPDR Spectrum Matters has *inter alia* identified the 700 MHz band as an important tuning range from within which the BB PPDR spectrum ideally shall come from after WRC-15, where this band will change status in the Radio Regulations to MOBILE on a co-primary basis with BROADCASTING as decided by WRC-12.
- 4) the FM PT49 has furthermore calculated an average spectrum need for Broad Band PPDR to be at least 2 x 10 MHz based on the IMT (LTE) standard, where some countries will need considerable more than that (ECC Report 199)
- 5) the 700 MHz band is a global band within which the USA were the first to allocate LTE spectrum for Broad Band PPDR networks.

MSI propose to insert (*after the text in italic*) the following text (**shown in bold**) in the RSPG opinion:

The UHF band is also heavily used for Program Making and Special Event (PMSE) services, especially wireless microphones. PMSE services make use of the white spaces between the TV broadcasts. It is unlikely that such use can continue in the 700MHz sub-band if it is used for mobile broadband. The amount of spectrum available for PMSE services was already diminished when making the 800 MHz band available for mobile broadband. There is need to take account of the spectrum needs for PMSE services and to provide a solution for the continuation of PMSE services elsewhere in the UHF band or in other appropriate bands.

Another important NEW sectoral application identified for mobile Wireless Broad Band is PPDR, the spectral requirements for which are studied in detail in ECC WG FM PT49. This CEPT expert group of administrations, Emergency Response Representatives and the serving industries has identified the 700 MHz band studied under Agenda Item 1.2 of the WRC-15 as a tuning range from within which “sufficient spectrum (as referenced in RSPP Article 8.3) is made available under harmonized conditions.....”

Member States wishing to implement Broad Band PPDR services are confident that least restrictive regulations of this band as proposed under the EU 700 MHz Mandate will in addition hereto be instrumental in covering the scope of Article 8.3 of the RSPP in as much as the CEPT ECC CPG can develop ITU-R CPM15 text to support the inclusion of this band as a tuning range in the ITU-R Resolution 646 for Region 1 under AI 1.3.

Sincerely yours

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