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Radio Spectrum Policy Group - Secretariat
DG CNET B4: Spectrum – Office: BU33 7/065
European Commission
B-1049 Brussels
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Ref: Comments on the Radio Spectrum Policy Group's Draft Opinion on a Long-term strategy on future spectrum needs and use of wireless audio and video PMSE applications (DG CNET/B4/RSPG Secretariat)

First may I thank the RSPG and especially the members of the PMSE group for a well-balanced document and for continuing the work started in the Lamy committee

For those not familiar with my name and to place my suggestion in context: I have been involved in what is now referred to as PMSE since the 1960s and sat on the UK group in 1982 which ultimately allocated spectrum for independent Theatre and production use, I ran the licencing organisation of all UK independent PMSE activities under contract to the UK Radio Agency from 1988 until 1997. I have chaired the ETSI group dealing with PMSE since 1991 and I also chair ETSI TC Safety, as well as working within various CEPT and lately ITU groups working on PMSE issues. For the avoidance of doubt: until recent years this work was funded by myself and recently via myself and parts of the PMSE industry

Whilst the Draft Opinion recognises and clearly identifies the issues facing PMSE currently it does not provide "action points" or provide a roadmap to give confidence to users and manufactures, I hope the following suggestions can be considered and included in the final document.

The Draft Opinion:

should provide a clear roadmap for users and manufactures on access to spectrum until 2030

recognises that the 470-694 MHz band is vital to the industry as a core band for the foreseeable future; this band should be protected through an EC decision from disruptive technologies such as White Space Devices and Supplementary Downlinks. Proposals for such technologies have already surfaced in parts of Europe. Where the band 694-862MHz is not in use for IMT PMSE should have continued access (this should be identified via ECC Recommendation 70-03).

should provide a clear statement on long term certainty for the PMSE industry by confirming access to the 470-694 MHz band until at least 2030; long-term reliable planning for PMSE requires that new spectrum be considered as early as possible and announced at least five years in advance to allow R&D plus user acceptance

should also encourage all member states to fully implement the EC decision 2014/641/EU harmonizing the 800 MHz duplex gap and 1800 MHz duplex gap

In the immediate future, a portion of the UHF band and a smaller portion
of the VHF band should be dedicated to PMSE as a primary user dependant of geographical location

should encourage the EC to harmonise the 1350- 1400 and 1518-1525 MHz
bands and work via the CEPT-ITU for these bands to be placed in the ITU Radio Regulations

In its section *Improvements in working practices* the document should clearly
Identify how PMSE spectrum management can be improved, or at a minimum should request CEPT to study the issue

should clearly identify how the issue of PMSE spectrum will be monitored: would this be via a permeant RSPG sub group?

could identify possible world wide spectrum for PMSE to replace the 694-862MHz lost to IMT, The UK identified the 1525-1559 MHz band and a request for this to be studied could be considered. Within Europe the DECT band would make a good band for sharing and CEPT could be requested to study this

could identify additions to the CEPT PMSE page which incorporates maps identifying spectrum available, especially for major cities

In the case of Video PMSE:

should ensure primary status for Video PMSE in the 2.3-2.4 GHz band especially for airborne use

should encourage member States to continue use of any 2-2.7GHz spectrum which does not have IMT rolled out in that location

I look forward with interest to reading the final opinion

Best regards

Brian Copsey