



APWPT e.V., Pappelallee 78/79, D-10437 Berlin

Radio Spectrum Policy Group

Ref: Public Consultation on the Draft RSPG Work Programme for 2022 and beyond

The Association of Professional Wireless Production Technologies (APWPT), the European organization representing the PMSE sector, appreciates this opportunity to comments to RSPG's Work Programme for 2022 and beyond. Please find below APWPT's comments on the specific topics of interest:

WRC-23

and

Strategy on the future use of the frequency band 470 – 694 MHz beyond 2030 in the EU

Agenda item 1.5 of WRC23 is of very great interest to the organisations APWPT represents, as they need a long-term binding decision for future investments and related work.

Please note: The band 470 – 694 MHz is the core band for high quality audio PMSE applications and those PMSE applications need access to this band beyond 2030.

Although APWPT understands the special activity 'Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU', it is surprising that the timelines of these programme topics do not match. It seems that the Final Opinion on EU position for WRC-23 is planned to be ready at the time the public consultation for the frequency band 470 -694 MHz in question will start.

APWPT would like to recommend that timelines do match so that the opinion on the future of the frequency band 470 – 694 MHz is ready before the WRC-23 opinion is finalized.

APWPT is supporting both initiatives and respectfully asks to be invited on both discussion topics.

APWPT supports the position to maintain the exclusive primary allocation to broadcasting with secondary allocation to PMSE as it stands today, without further changes at WRC-23.

In this context, we would also like to stress the highly devastating consequences of the Covid-19 pandemic for our sectors and severe economic losses made during that time. Legal certainty as to the material and equipment used for the years to come is essential to help the media and live performance sector recover from the crisis, especially as it would be impossible for companies and organisations in the current situation to invest in new equipment, if available at all.

The development of 6G and possible implications for spectrum needs

APWPT supports RSPG to develop a guidance for future mobile IMT networks. We are of the view that such a work has to start with a clear definition of what is the purpose and goals for 6G, learning from the current discussion where the term 5G has not been yet defined including its purpose and goals. This missing definition is still creating a lot of discussions in different regulatory groups.

APWPT is supporting this programme topic asking for a clear definition of the term 6G.

We also ask not to limit the discussions – after goals are defined – to 3GPP technologies only, but to keep the technology discussions neutral.

Finally, APWPT would like to point out that the use of new technologies does not necessarily lead to a saving of radio spectrum. In the future, too, PMSE will still need high-quality frequency ranges for dedicated use because of their very special frequency use requirements (e. g. 100% duty cycle of audio and video links). Europe should consider how to implement a European harmonisation of such frequency ranges for the future work of European teams in the content and event production.