

13 December 2021

## ZVEI comments on the draft work programme of the Radio Spectrum Policy Group (RSPG) for 2022 and beyond

ZVEI represents the interests of the German electrical and digital industry. Our members include manufacturers who develop and produce radio microphones (PMSE) and consumer electronics devices. The future use of frequencies in the range between 470 and 694 MHz in Europe and beyond therefore are of utmost importance for our members. A redistribution of the UHF-band would hit the PMSE sensitively and jeopardize the users such as artists, trade fairs and the event business in general. ZVEI therefore strongly advocates keeping the frequencies of the UHF-band allocated to broadcasting and PMSE beyond 2030.

We would therefore like to thank the Radio Spectrum Policy Group (RSPG) for the opportunity to comment on their draft work programme for 2022.

According to the draft work programme, the RSPG's final opinion on the "Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU" ("EU-Strategy") should be published in February 2023. The RSPG's recommendation on an EU-position for the World Radiocommunication Conference 2023 (WRC-23), however, is scheduled for November 2022. This schedule is questionable from our point of view, as the EU-position for the WRC-23 should be a *result* of the EU-Strategy which needs to be available before the RSPG-recommendation on WRC-23. These timetables should therefore be adjusted accordingly.

Furthermore, it does not seem feasible to strictly separate these two topics as the draft work programme foresees. The decision on the future use of the 470-694 MHz-band at WRC-23 is of major importance and its outcome will influence on the realization of the EU-Strategy on the future use of the UHF-band. In addition, it can be assumed that the final opinion of the RSPG on the EU position for WRC-23 would have a direct impact on further discussions within the RSPG on the strategy for future use. These discussions would presumably no longer be completely open and would probably be guided by the final opinion on the WRC position that is already available. Therefore, the EU-Strategy on the use of 470-694 MHz beyond 2030 and the EU position for WRC-23 cannot be treated separately by the RSPG.

In general, ZVEI calls upon RSPG to take the following points into account for its 2022 work programme with regards to the activities "WRC-23" and "Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU":

### **No culture without frequencies**

Artists and musicians need broadcasting UHF-frequencies for the interference-free operation of wireless microphones, in-ear systems, talk-back systems, and audio links. Trade fair organizers, universities and many other users also need these frequencies.

### **Large frequency losses to mobile communication since 2010**

Since 2010, the so-called "Digital Dividend 1" and "Digital Dividend 2" have allocated more than 40 percent of the broadcasting UHF spectrum to mobile communications. Today, a large portion of the spectrum is used by mobile communications.

### **Mobile communications do not need the broadcasting UHF spectrum**

The gaps in coverage for mobile communication networks in rural areas are due to a lack of economic efficiency, not to a lack of frequencies. That is why, for example, Germany has set up a national mobile communications infrastructure company (MIG). Its purpose is to solve these coverage problems, especially in rural areas. The state is funding the expansion of the mobile communications and fiberoptic infrastructure with €2.1 billion. Soon there will be fast internet nationwide and no more "dead spots" – with no need to make use of the UHF spectrum.

### **The military and security agencies do not need the broadcasting UHF spectrum either**

Many doubt that the military and security agencies use their extensive spectrum efficiently. There is room for improvement here. Moreover, they could use existing mobile communication frequencies above 694 MHz. These frequencies would be available immediately and at very low cost. For example, the UK Government just decided PPDR-communication (Public Protection and Disaster Relief) will in future be distributed via the 4G network of the UK's second largest mobile phone provider. In contrast, a broadband communication network of their own would cost many billions and take many years in development, including for new terminal devices. The likelihood of such a costly project succeeding is uncertain.

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