

## **Response from Motorola to the Consultation on the proposed RSPG 2010 Work Programme**

### **General statement:**

Motorola would like to thank to the European Commission for the opportunity to contribute to Public Consultation on the 2010 DRAFT RSPG Work Programme.

### **Multiannual Radio Spectrum Policy Programme**

Motorola agrees with the aim of this work item to develop in the form of RSPG Opinions a set of common policy objectives with a view to create a European environment of highly efficient and coordinated spectrum use in support of the functioning and further development of the internal market.

For the work outline we suggest in particular the inclusion of a societal oriented common policy objective to develop a coordinated spectrum platform in support of seamless, cross-boarder communication facilities for European PPDR response forces to operate even more efficient in an ever more difficult environment of natural disasters and international crime.

We suggest the time span of this work item to reach ahead beyond the current ITU-R study period in order to take on board and discuss as early as possible the emerging international activities/research and forward looking study items in a global context.

### **Harmonised EU participation in international negotiations**

Motorola agrees with the fundamental idea of this work item of expanding and developing policy issues related to the agenda items of the forthcoming WRC including the provision of guidance on strategic objectives also in the preparatory work of CEPT. We are in particular supportive of the proposal to explore the possibility to create synergies with other Regions<sup>1</sup> (in the sense of ITU-R) with the aim of identifying world-wide economies of scale and related European business opportunities.

In general we support an EU common approach to provide advice to Member States in the international negotiations including bilateral talks with Third Countries regarding spectrum coordination issues.

### **Digital Dividend**

Motorola fully agrees with the proposed work streams:

- 1) Establishment of increased spectrum efficiency in the bands IV and V
- 2) Development of a cooperative process to assist Member States with cross-boarder coordination, and
- 3) Further advice the Commission in the implementation of recommendations as published in the previous opinions.<sup>2</sup>
  - a. As the RSPG07-161 Opinion specifically identifies the Digital Dividend as hosting Public Protection and Disaster Relief Services we suggest that this work stream incorporates the development of possible ways to implement this. Furthermore in this effort we suggest the Group takes inspiration from the Council Recommendation 10141/09<sup>3</sup> of the General Secretariat.

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<sup>1</sup> As an example several member states of APT (Region 3) are discussing a Digital Dividend as wide as 108 MHz (698 . 806 MHz)

<sup>2</sup> RSPG09-291 and RSPG07-161

<sup>3</sup> Draft Council Recommendation on improving radio communication between operational units in border areas

## **Competition Aspects in spectrum assignment and usage**

Whilst we note the significance of this work item we shall limit our comments to the general remark that care should be taken in striking the right balance between the level of competition and the ability of the networks to offer high quality services and coverage.

## **Technology impact on spectrum management**

Motorola agrees with the two proposed work streams as follows:

Development of a set of regulatory recommendations covering the future deployment of Cognitive Radio based networks and terminals.

We suggest in this work to liaise with ETSI,<sup>4</sup> where work is well underway in this area

Apart from the Digital Dividend consideration should also be given to the C-band as a target band for future Cognitive Technologies. In this band sharing between FSS and MOBILE may potentially benefit from new and innovative applications of Cognitive Radio platforms.

With regards to Bands III and the L-Band we suggest that all relevant sector interests and expertise should be called upon in the work along with the broadcasting sector.

## **Functioning of RSPG in the new Institutional set up**

Motorola is applauding a forthcoming revision of the reporting mechanism facilitating the responding to external requests for opinions coming from Parliament and Council and the alignment of the Rules of Procedure with the provisions of the revised regulatory framework.

## **Reference Documents and Links**

[1] The Stockholm Programme – An open and secure Europe serving and protecting the citizens <http://register.consilium.europa.eu/pdf/en/09/st17/st17024.en09.pdf>

[2] Council Recommendation on improving radio communication between operational units in border areas <http://www.tetramou.com/uploadedFiles/Files/Documents/Coreper-council%20recommendation%20Cross%20border%20communication%20BLG20059%5B1%5D.pdf>

[3] Report on the requirements of Public Safety spectrum users, available at: <http://www.public-safety-first.eu>. , May 2008

[4] Motorola's position presented during the Public Hearing "*Exploiting the digital dividend*" – a European approach, March 24<sup>th</sup> 2009  
[http://ec.europa.eu/information\\_society/policy/ecomm/radio\\_spectrum/document\\_storage/consultations/2009\\_digitaldividend/replies/070\\_motorola.pdf](http://ec.europa.eu/information_society/policy/ecomm/radio_spectrum/document_storage/consultations/2009_digitaldividend/replies/070_motorola.pdf)

[5] Motorola contribution to joint industry response to the consultation on the RSPG Opinion on the Digital Dividend, July 3, 2009.  
[http://rspg.ec.europa.eu/consultations/responses\\_digitaldividend\\_090515\\_0630/index\\_en.htm](http://rspg.ec.europa.eu/consultations/responses_digitaldividend_090515_0630/index_en.htm)

[6] Motorola contribution to joint response to the consultation on the RSPG<sup>5</sup> Opinion on the Digital Dividend, June 30 2009.  
[http://rspg.ec.europa.eu/consultations/responses\\_digitaldividend\\_090515\\_0630/index\\_en.htm](http://rspg.ec.europa.eu/consultations/responses_digitaldividend_090515_0630/index_en.htm)

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<sup>4</sup> ETSI TC RRS

<sup>5</sup> RSPG (Radio Spectrum Policy Group)