

RESPONSE TO PUBLIC CONSULTATION ON THE DIGITAL DIVIDEND

The undersigned 3 associations, 3 public safety radio network operators and 7 radio manufacturing companies want to thank the Commission for the opportunity to respond to the EC Consultation on Digital Dividend by providing their joint views below. As it has been said many times the Digital Dividend, when properly utilised, will offer a once-in-lifetime opportunity to improve and enrich the mobile service access possibilities of consumers, businesses and also various functions of the society – to take public safety, healthcare and environment as example beneficiaries – when so decided.

We share the overall views that mobile communication requires and deserves more radio spectrum and the new spectrum identified for mobile use can be best utilised when its usage is adequately harmonised throughout Europe for the benefit of both users and equipment providers.

The undersigned organisations represent users and providers of mission critical radio communication services and tools from public safety agencies to other critical infrastructures and industrial users. One of our main concerns recently has been how to ensure that the next generation ICT services and applications will be reliably accessible to the end users in the field when the competition on radio spectrum resources is making radio frequencies both harder to find and also more expensive to the professional users like government departments whose funding comes from the taxpayers. The ongoing dialogue on the Digital Dividend has been seen as an important vehicle towards satisfactory solutions.

Some representatives of the Public Safety community were invited to attend the Commission hearing on the Digital Dividend in early March this year and delivered common views on how the mission critical field operations will become increasingly dependent on computers and ICT solutions that have to be extended out to the field to improve both operational efficiency and officer safety while keeping operating costs at acceptable level. The attendees also re-iterated the opinion that the nature of mission critical operations require that the key applications are provided by medium that is reinforced to maintain full service capability also during accidents, incidents and disasters of any nature. We fully share those views.

The undersigned organisations strongly suggest that the needs of the mission critical radio users are kept in consideration while making decisions concerning future use of UHF radio frequencies. We do not insist that the frequencies should be found inside the 790 to 862 MHz band itself (if that turns out to be impossible) as the exact frequencies are, after all, less important than finding a

technically and economically feasible solution. The ongoing dialogue on Digital Dividend is an excellent opportunity to also consider and evaluate the needs of mission critical users and consequently take the needed actions at a political level to move the issue forward towards practical decisions at an administrations level.

We note that the Consultation document addresses the issue of Public Protection and Disaster Relief as "unforeseen additional broadband use" in section 4.7. Even though most of the organisations and individuals working inside the PPDR sector do not consider PPDR needs as being "unforeseen" we take that sentence as a positive indication of emerging awareness of that requirement . We would like to encourage the Commission to proceed on this route towards concrete action plans to resolve the situation for the benefit of the societies.

In the earlier response of eleven companies and organisations to the Digital Dividend Opinion document of the RSPG we described the key study results showing the need for new higher speed data services and the requirement for radio spectrum below 1 GHz to enable those services - The JHA Council Recommendation (10141/09) from June 2009 on improving radio communication between operational units in border areas, the System Reference Document (TR 102 628) from ETSI, and the conclusions of the extensive questionnaire conducted by the the ECC and ERO in early 2009. We believe that the views and conclusions of those expert bodies clearly demonstrate and confirm those requirements.

Further we propose that the Commission find means to encourage the member states to recognize that the spectrum requirements of public safety/PPDR are a special case and adopt policies and processes that will enable the public safety/PPDR organisations to have access to new spectrum at a cost that is within the limits of their budgetary resources as these are continually under pressure because of ever changing demands for service and the need to implement enhanced technological systems to provide those services in the most effective manner possible.

We are happy to expand our views by discussion or correspondence in case there is need for further clarification. The signatories can be reached via the CEO of the TETRA Association, Phil Kidner [phil.kidner@tetra-association.com]

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