

**PSCE RESPONSE TO THE DRAFT RSPG OPINION ON THE RADIO SPECTRUM
POLICY PROGRAMME**

Public Safety Communication Europe Forum (PSCE) as a permanent autonomous organisation aiming at improving provision of public safety communications and information management systems and the safety of the citizens during crisis and emergency situations welcomes the opportunity to present its expertise in the context of this consultation.

PSCE is constantly involved in the activities concerning the radio spectrum at EU level with the objective to closely monitor the latest developments as well as to constructively contribute to the ongoing dialogue in this area. Further to its contribution to the previous public consultations and following its active participation to the crucial events on this subject, PSCE would like to commentate also on several points presented in the draft RSPG Opinion on the radio spectrum policy programme.

PSCE's contribution therefore consists of the below-mentioned remarks having a primary linkage to the public safety services.

- **Point 6**

PSCE shares the same view with the RSPG. Indeed, the RSPG should be continuously monitored including an assessment of progress at mid-term. The feedback from the stakeholders is crucial and public consultation along with the workshop would provide a great opportunity to collect, analyse and integrate the new viewpoints and remarks into the RSPG. Assessment of the progress at mid-term would also enable to reflect on new developments and trends in this area.

- **Point 8**

While fully agreeing with its content, PSCE would suggest slightly re-formulating (see in **red**) the first sentence of the Point 8 as follows:

“It is the Opinion of the RSPG that one of the key objectives of EU spectrum policy is to enhance the quality of life **and the safety** of European citizens.”

- **Point 18**

Similarly to the previous remark and in order to avoid having too general statement, PSCE proposes to add the following comment (see in **red**) at the end of the Point 18:

“The RSPG believes that the main objective of European spectrum governance shall be to facilitate the development and functioning of the internal market and to enable access to spectrum for applications and uses where demand is growing. The appropriate balance shall be assured between protecting existing uses and facilitating access to spectrum for new uses and applications. Thus spectrum shall be managed in a way as to reflect current and future demand **(e.g. Public Protection & Disaster Relief)**.”

- **Point 31 (paragraph 1)**

According to the point 31 (paragraph 1), one of the high-priority spectrum policy objectives is to “identify EU level policies that have a spectrum dimension and assess how to facilitate the achievement of such policies.” To this end, PSCE would like to emphasise that the Civil Protection Policy is definitely one of the crucial areas directly linked to the RSPP, calling for the significant recognition.

- **Point 31 (paragraph 4)**

Pursuant to the previous comment, the point 31 (paragraph 4) states that one of the objectives is to “identify developing and potential future significant uses of spectrum taking into account market and technology trends.”

In the context of implementing the new technologies in the area of civil protection, PSCE would like to put emphasis on the growing needs of spectrum for ensuring the security and safety of citizens.

PSCE welcomes the opportunity to contribute to this strategic issue and would like to reassure that it will closely monitor any future developments in this regard and remains available for providing whenever necessary its expertise.

29 April, 2010