

23 September 2022

Responses uploaded to: <https://www.internetconsultatie.nl/nfpwijzigingpamr/reageren>

Reference: NFP Wijziging PAMR-Band / reageren op consultatie

Dear Madam, Sir,

We are writing to you on behalf of the 450 MHz Alliance in response to the public consultation on the *NFP Wijziging PAMR-Band*.

The 450 MHz Alliance is an industry association that represents the interests of stakeholders in 3GPP compliant technologies in the frequency range of 380 – 470 MHz which address use cases critical to society. Our members include wireless industry companies such as spectrum license holders, carriers and leading equipment manufacturers, as well as companies representing various vertical markets for business and mission critical communications. The Alliance aims at spectrum harmonisation within each of the 3 ITU regions, the further development of standards in the 400 MHz band and the creation of a mature ecosystem for all standardized frequency bands.

The 450 MHz Alliance also responded to your Public Consultation in May and is grateful for this opportunity to further share our vision on the developments in the 400 MHz band. We do so by providing answers to each of the three questions you raised for Consultation.

Question 1: What do you think of the draft decision?

In our earlier feedback on the Public Consultation in The Netherlands, the 450 MHz Alliance proposed to continue the current license and possibly even enlarge it to 2x 5 MHz or somewhat lower if there's no spectrum available for it (for example 2x 4,5 MHz to allow for 1,25 MHz legacy CDMA and 3 MHz LTE including a gap band). Given the necessary investments, such continuation should be for a period of at least 25 years.

These proposals were based on international trends and the need that the 450 MHz Alliance sees for global Harmonization and Standardization, for which compliance with 3GPP standards is one of the guiding principles. It is also based on the input from the operators among our members, who globally experience that a license duration of more than 20 years and sufficient bandwidth are prerequisites for profitable deployment of PAMR networks. From this perspective, the 450 MHz Alliance strongly supports the vision that is expressed in the draft decision not to split the license on the long term and to assign the 3 MHz available to a single user. A license duration of 26 years as suggested by Stratix would allow the license holder to invest in an excellent, resilient and secure infrastructure that will fulfill the needs of several specific user groups and may be of significant importance for The Netherlands as a whole. The 450 MHz Alliance endorses this proposal.

Concerning the decision foreseen for the period up to 2035, the 450 MHz Alliance believes that a license duration of 10 years in combination with a bandwidth of only 2x 1,5 MHz, will make it impossible for any enterprise, even for an incumbent operator, to use the spectrum

in an efficient and profitable way. An application for such a license shall, in our opinion, only be done for strategic purposes, such as creating (or maintaining) a foothold in preparation of the 2035 assignment, or preventing others to obtain the license. As a consequence, we believe that this part of the spectrum will remain under-used until 2035, which would be a great miss given the value of this part of the spectrum for the evolution of smart infrastructures and IoT.

The 450 MHz Alliance therefore repeats our advice to issue 2x 3 MHz or more for a period of 25 years or longer.

Question 2: What do you think about the license duration of (more than) ten years?

As stated before, the 450 MHz Alliance believes that a license duration of 10 years in combination with a bandwidth of only 2x 1,5 MHz, will make it impossible for any enterprise, even for an incumbent operator, to use the spectrum in an efficient and profitable way. An application for such a license shall, in our opinion, only be done for strategic purposes, such as creating (or maintaining) a foothold in preparation of the 2035 assignment, or preventing others to obtain the license. As a consequence, we believe that this part of the spectrum will remain under-used until 2035, which would be a great miss given the value of this part of the spectrum for the evolution of smart infrastructures and IoT.

Question 3: A geographical split is being considered between the use of these frequencies on land and in territorial waters, and on installations at sea (in the Dutch part of the continental shelf in the North Sea). What do you think about a possible geographical split?

The 450 MHz Alliance believes that a geographical split should not be done. Two different PAMRs for the land and for the Continental Shelf may be beneficial since different use cases and different user groups may be served better this way. However, such split would have severe setbacks for the coverage along the coast line. Because of the radio propagation characteristics across the sea surface, signal levels along the coast line must be tuned to extremely low levels to keep harmful interference within acceptable limits. This would lead to significant underusage of the spectrum in a large area and therefore the 450 MHz Alliance discourages the consideration to split the license as mentioned.

The 450 MHz Alliance is at your disposal should you require further explanation regarding any of the points raised through this response. This could be in the form of written text, phone calls or even a workshop with some of our members. Please let us know if you wish to engage in any form of further information exchange.

On behalf of the 450 MHz Alliance, we wish to express our appreciation for this opportunity to share our insights.

Yours Sincerely,



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Consent: the 450 MHz Alliance has no objections to publication of this memo or of parts of it.