

The intention formulated in the Draft Decision of the Minister of EZK, containing package amendment 2023-1 to the National Frequency Plan 2014, in particular: The intention to allow Short Range Devices (SRDs) in the entire 70cm amateur band from 430-440 MHz, will, in my view, lead to significant harm and limitations to the capabilities of the amateur radio service, and should be adjusted in consultation with the representative associations VERON, VRZA and DARC in Germany to be adjusted. Please find my motivation below.

Motivation:

1.) In recent years, the amateur radio service has already faced a significant increase in man-made noise on the HF bands (source:

<https://ieeexplore.ieee.org/document/8396864>.

The 70 cm (430 - 440 MHz) band also forms an important basis for the amateur radio service now and in the future. The amateur radio service is characterised by technically advanced experiments and public scientific research, in which among other things with use of low power, bridging large distances, with correspondingly weak receive signals comparable to radio astronomy, for example. It is therefore essential to use the frequencies of the amateur radio service to be kept as free as possible from man-made noise and interference by SRDs.

2.) The frequency range of 430 - 432 MHz and 438 - 440 MHz is used both in the Netherlands and in Germany

as the entry frequency for licensed unmanned automatic repeater stations. These stations are often located in a high location, with high reception sensitivity. At higher interference levels, e.g. due to SRDs or spread-spectrum applications, these receivers are restricted in their operation, and may lead to unwanted relaying of signals from SRDs.

3.) Experiences with current shared use between 433 and 435 MHz make it plausible that the packet change will lead to further problems between (users of) SRDs and the amateur radio service. (Source:

<https://www.rdi.nl/onderwerpen/radiozendamateurs/documenten/publicaties/2020/06/22/het-frequency-range-between-433-and-435-megahertz>)

4.) The frequency area of (435-438 MHz) has been internationally allocated to satellite communications (source: [https://www.iau.org/wp-content/uploads/2020/01/Amateur-Services-Spectrum-2020\\_.pdf](https://www.iau.org/wp-content/uploads/2020/01/Amateur-Services-Spectrum-2020_.pdf)), and should be kept free from SRDs for this service. Satellite operators cannot be expected to change transponder frequencies in satellites to change for the benefit of a single country. Disabling or damaging causing damage to these frequencies violates international agreements. Other signals in this area are detrimental to reception of the weak signals from space