

National IT and Telecom Agency,  
Att: Helle Bøjen Larsen  
Holsteinsgade 63,  
DK-2100 Copenhagen Ø

Glostrup, 8. September, 2009

**Reg.: The bands 2500 – 2690 MHz and 2010 – 2025 MHz - Consultation Response**

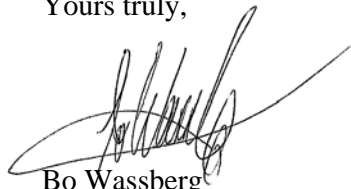
Motorola A/S hereby thanks the Danish IT and Telecom Agency for the opportunity to comment on the regulatory conditions proposed in the Draft Information Memorandum of July 2009.

With reference to the provisions of the COMMISSION DECISION<sup>1</sup> we note that p.24 in the draft memorandum proposes a regulatory measure based on a BEM for terminals (Uplink BEM). We want to highlight that it goes beyond the provisions of this Spectrum Decision, which alone specify in-block power limits for terminal stations, mobile as well as fixed installed. It is understood that it is the role of ETSI to define the technical requirements under the RTTE Directive Article 3.2 for the 2.6 GHz band.

We are concerned by the confusion it may create in the global terminal markets if DNK alone go beyond the minimum technical constraints set forth by the EU Commission by proposing a terminal BEM which is neither part of a harmonized standard nor a pan-European regulatory requirement. We therefore propose that the reference to Uplink BEM should be deleted.

Further we note that the same BEM from CEPT Report 19 are also defined as technical requirements for the 2010MHz band. As this band is a part of the so-called “UMTS core” band, also the same technical requirements should be defined. Therefore, we propose to use the WCDMA masks as technical requirements for this band. This is already the case in other European countries.

Yours truly,



Bo Wassberg  
Adm Direktør



Steffen Ring  
Teknisk Direktør

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<sup>1</sup> 2008/477/EC of 13 June 2008: On the harmonisation of the 2 500-2 690 MHz frequency band for terrestrial systems capable of providing electronic communications services in the Community