Dynamic Spectrum Alliance Limited
http://www.dynamicspectrumalliance.org

September 21, 2026

Staatssecretaris van Economische Zaken en Klimaat
Ministerie van Economische Zaken en Klimaat
Postbus 20401, 2500 EK Den Haag
The Netherlands

Re: DSA response to the proposed Amendment to the National Frequency Plan 3800 - 4200 MHz

Dear Sir/Madam,

The Dynamic Spectrum Alliance[1] (DSA) appreciates the opportunity to comment on the proposed amendment to the Dutch National Frequency Plan 2014 concerning the 3800–4200 MHz frequency band.

The DSA supports the Netherlands' objective of enabling more efficient and innovative use of the 3800–4200 MHz band, including through non-public mobile networks. Such networks can support enterprise connectivity, industrial digitalisation, campuses, public services, logistics, critical infrastructure and other local connectivity requirements. The DSA also recognises the need to protect public-task Fixed-Satellite Service (FSS) use, cross-border satellite services and other incumbent operations.

The proposed amendment is an important step in the Netherlands' evolving approach to the 3800–4200 MHz band. From 1 March 2028, it limits the FSS space-to-Earth designation to public tasks at existing locations. The explanatory notes also indicate that the framework for future use of the band will support various types of non-public mobile networks suitable for 5G and 6G-based professional applications, including private and self-managed networks. According to the reference document, the new designation will be subject to certain geographical restrictions in addition to the already applicable power restrictions.

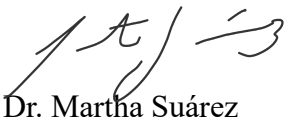
As the scope of these restrictions remains under study and will be determined through a subsequent amendment to the National Frequency Plan, the DSA respectfully recommends that the future framework remain technology-neutral and not unnecessarily prescribe a single radio technology, network architecture, operator category or spectrum-access mechanism. Subject to

[1] The DSA is a global, cross-industry, not for profit organization advocating for laws, regulations, and economic best practices that will lead to more efficient utilization of spectrum, fostering innovation and affordable connectivity for all. Our membership spans multinationals, small-and medium-sized enterprises, as well as academic, research and other organizations from around the world all working to create innovative solutions that will benefit consumers and businesses alike by making spectrum abundant through dynamic spectrum sharing. A full list of DSA members is available on the DSA's website at: https://www.dynamicspectrumalliance.org/members.

appropriate technical conditions and the protection of incumbent users, the Netherlands could consider a range of proportionate mechanisms for non-public mobile networks, including local or site-specific authorisations, individual licensing, light licensing, geographically differentiated access, shared-spectrum arrangements and database-assisted or automated coordination approaches.

The DSA and its members welcome continued engagement with the Netherlands' Ministry of Economic Affairs and Climate Policy as the National Frequency Plan framework for the 3800–4200 MHz band is further developed and implemented. We would be pleased to discuss these comments and provide any additional information.

Sincerely,



Dr. Martha Suárez
President
Dynamic Spectrum Alliance