



## **Cable Europe comments on the Draft RSPG Opinion on a long-term strategy on the future use of the UHF band (470-790 MHz) in the European Union**

12 January 2015

### **Introduction**

The European cable TV industry currently provides broadband, telephony and digital TV services to approximately 76 million customers. Cable Europe represents Europe's leading cable TV operators and their national trade associations. The aim of Cable Europe is to promote and represent the industry's public policy positions and business interests at both European and international level, and to foster co-operation among its members.

Cable TV operators were the first to enable Convergence, being the initial Electronic Communication operators to develop triple play offers and representing a complete turnaround on consumers' choice. Today, since this became the main commercial choice, all technologies require an harmonized framework that combines every player services, reinforcing the importance of the RSPG deliveries.

Cable Europe welcomes the opportunity to comment on the Draft RSPG Opinion on a long-term strategy on the future use of the UHF band (470-790 MHz) in the European Union.

### **Long-term strategy on the future of the UHF band in the EU**

The allocation on a co-primacy basis of mobile service alongside broadcasting service in the 694-790 MHz ("700 MHz") frequency band after the WRC-15 confirms the importance of WBB services. However, Cable Europe is of the view that the CEPT mandate to develop harmonized technical conditions for the management of the 700 MHz band has yet to be completed in particular with respect to the rules of harmonization for the "**non-radio end-user equipment for fixed broadcasting and broadband electronic communications services**".



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RSPG has a particular responsibility to advise and assist the European Commission in the development of radio spectrum policy, in particular to ensure that spectrum management preventively addresses issues of potential consumer and business harm.

Cable Operators have been a cornerstone of convergence and the development of innovative solutions such as Wi-Fi. Indeed, we would draw the RSPG's attention to the growing impact Wi-Fi is having on the mobile broadband market. As noted in a recent study undertaken on behalf of the European Commission<sup>1</sup> *"The Wi-Fi market as a whole is very mature in Europe, with over 70% of households already having a Wi-Fi access point in some Member States. Wi-Fi capability has also become increasingly a standard feature on smart phones, and in consequence off-load to Wi-Fi is now also well established. Currently, **the great majority of this off-load is onto private (mainly home) Wi-Fi connections**, with only a few per cent being off-loaded to public Wi-Fi hotspots."*

Therefore, if Wi-Fi represents the great majority of WBB consumption, we believe the RSPG has a duty to carefully examine how to most efficiently re-allocate the future use of the 700 MHz band. Cable Europe believes there is a need to conduct a thorough impact assessment before a final decision is achieved, especially when license-exempt spectrum bands are determinant and are facing a shortage.

Furthermore, the work programme highlights that *"Most Member States consider that at the moment various platforms complement each other [...]"* which reinforces the need to duly address the rules of harmonization for the radio and non-radio end-user equipment for fixed broadcasting and broadband electronic communications services using licensed and license exempted spectrum bands.

With this forward looking approach Cable Europe expects that coexistence concerns will be tackled through an end-to-end analysis that enables all electronic

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<sup>1</sup> Study on impact of traffic off-loading and related technological trends on the demand for wireless broadband spectrum - ISBN: 978-92-79-30575-7



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communications operators to contribute in a level playing field and any existent one is not impacted by new spectrum users.