

## **Deutsche Telekom 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 (RSPG14-585(rev1))**

### **Introduction**

Deutsche Telekom AG (DT) 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.

The importance of mobile broadband connections has increased dramatically. The demand for wireless broadband capacity can not only be satisfied by technology improvements and densification of networks but needs also additional spectrum resources. Due to the propagation characteristics the UHF band plays a major role in providing mobile broadband access to sparsely populated areas. Although being historically utilized almost exclusively for terrestrial broadcasting, this band can be regarded as the only economically viable measure to grant broadband access to the households located in those areas. As for TV broadcasting, its provision is not based only on terrestrial services any more. People rely more and more on other distribution networks such as cable, satellite or IPTV. Europe needs a forward looking thinking on how to provide the most benefit to the customers when using the UHF band.

### **The 700 MHz band**

The WRC-12 allocated the 700 MHz band in ITU-R Region 1 to the Mobile Service on a co-primary basis. The RSPG has made up their mind on how to use this allocation in Europe.

DT fully supports the RSPG position to make the 700 MHz band available for the provision of wireless broadband services in a coordinated manner. The experience gained when deploying wireless broadband services in the 800 MHz band has shown that the full potential can only be achieved by harmonization, otherwise the service provision is restricted. A binding legislative measure is the right approach to secure a certain level of commitment amongst the Member States and facilitates the decision making processes also outside the European Union.

DT appreciates that a deadline for the transition of the 700 MHz band to wireless broadband has been set to 2020 +/- 2 years. However, Member States should not be prevented from an earlier realization. The European Commission is asked to develop appropriate measures to limit the number of derogations.

An early agreement on an aligned cross-border regime and a corresponding channel plan for DTT is essential for the provision of a wide spread mobile broadband to the European Citizens, particularly in rural areas. DT welcomes the intention of RSPG to finalize this process already by the end of 2017. This supports those Member States having earlier plans for the allocation of the 700 MHz to Mobile Service.

### **The band below 694 MHz**

The RSPG states that “the band 470-694 MHz is mainly used for downstream audiovisual content distribution”. This is obviously today’s status but it does not reflect any future development. In the discussion about the future provision of broadcasting content there is very often no distinction between linear content and terrestrial distribution of such content. Although the demand for non-linear video content is growing the importance of linear content is still high but the means of distribution have changed. The provision of broadcasting and other audiovisual content is continuously changing over time also thanks to alternative distribution methods available for the customers. The more high speed broadband access is available the more IPTV connections will be established. DT is not convinced that there is any potential to provide 3D or UHDTV via DTT networks. Such kind of content will be preferably distributed via non-DTT platforms such as cable or IPTV.

Consequently DT does not support the idea to freeze the usage of the band 470-694 MHz until 2030. Such a measure would hinder innovation and prevent Europe from reacting in a flexible manner to any market changes.

The proposal to also deploy WBB DL as a solution of broadcast service would bring a higher degree of flexibility but does not enable Europe to be innovative or future oriented. The results from the PLUM study show that there is currently no evidence about whether the delivery of converged services by terrestrial networks will generate a high demand in the future and it is recommended to undertake a stock-taking in the next three to four years. On the other hand a number of studies have shown an increasing demand for wireless broadband access all over Europe.

Europe needs to be flexible at any point in time when deciding on how to use the UHF band in the future for the maximum benefit of its citizens. Such flexibility can only be provided by a flexible regulatory environment. Therefore DT recommends that Europe will not block any development towards a co-primary allocation of the band 470-694 MHz for the Mobile Service at the WRC-15. Such a decision would not be a prejudgment on how to use this band in the future but provides Europe with the maximum freedom to take decisions without involvement of a WRC.

DT welcomes the RSPG intention to provide alternative solutions to satisfy the spectrum demand of other users such as for PMSE and PPDR. It also welcomes that the RSPG recognizes the importance of appropriate receiver standards to support the coexistence of different services.