



Cable Europe

Cable Europe comments on the Draft Update of the RSPG Work Programme - *RSPG WP "2014 and beyond"*

6 January 2014

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 this represented a complete turnaround on consumers' choice. Today, since triple play has become an important commercial offer, it is crucial that policy makers and the RSPG develop a harmonized framework for spectrum that takes into account all players and all technologies.

Cable Europe welcomes the opportunity to comment on the Draft Update of the RSPG Work Programme – "***RSPG WP "2014 and beyond"***" aiming to contribute with industry insights that can promote an informed outcome.

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

Coexistence between end user equipment

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 for regulators. 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**".

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.

The work programme rightly 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.



The increasing relevance of Wi-Fi

Cable operators have been a cornerstone of convergence and of 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 Commission¹ *"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 taken by the policy makers, especially when licence-exempt spectrum bands are determinant and are facing a shortage.

Efficient awards and the use of spectrum bands harmonised for Electronic Communications Services (ECS)

BEREC is an essential platform through which to develop a clear view on how and to what extent the spectrum needs for specific bands may differ from one Member State to another.

In countries where cable's coverage is high, not only is the need for mobile WBB lower but in addition there is a need for a holistic approach that takes into consideration all existing technologies when deploying new ones.

As a general comment, on this particular topic, Cable Europe emphasizes the fact that wireless equipments' density is growing exponentially, urging spectrum policy makers to monitor and anticipate any coexistence between radio and non-radio end-user equipments using licensed and license exempted spectrum bands.

WRC-15 preparation (common policy objectives for WRC-15)

On this topic, Cable Europe is highly committed to contribute to the work that is being carried out by the RSPG on preparing WRC-15.

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



Cable Europe

The European Commission acted prudently in issuing a mandate² to CEPT that focused on the following - *"CEPT is also requested to collaborate actively with the European Telecommunications Standards Institute (ETSI) which develops harmonised standards for conformity under Directive 1999/5/EC. In this regard, CEPT must indicate the potential impact of the deliverables on this Mandate on non-radio end-user equipment for fixed broadcasting and broadband electronic communications services in support of standardisation work relating to interference mitigation."*

This mandate reflects that the European Commission - and specifically Vice President Kroes - is concerned about the co-existence of different uses within the frequency band. This point was also clearly made in a speech held at the Spectrum Management Conference, in Brussels on the 19th of June 2012 - *"Of course changes in the 700 MHz band may also affect others in other ways: from wireless microphones to emergency services, as well as cable and TV receivers."*

More, in the RSPG's WORK PROGRAMME FOR 2012 AND BEYOND, the following reference can be found: *"Interference management: Furthering efficient interference management through exchange of regulatory best practices concerning regulation and/or standardization"*. The RSPG should include this reference again on the WP under consultation. This task, which is critical to solve any interference in the increasingly density of spectrum devices, should focus on the interference and coexistence between radio and non-radio, as well as licensed and unlicensed equipments and services, and, furthermore, from an end to end point of view and not only from a receiver side.

The review of the Radio Spectrum Policy Programme

As set out above, Cable Europe considers that the RSPP is an essential public policy tool that must accommodate every stakeholders' concern, allowing the *"availability and efficient use of the spectrum necessary for the establishment and functioning of the internal market."*

The RSPP time frame is quite long, especially when it is recognized that the electronic communications market changes permanently and in a fast pace. To allow a continually vibrant market where consumers increasingly benefit from innovative broadband services, all spectrum policy tools must be perfectly synchronized and all impact assessments must be conducted.

With this forward looking approach Cable Europe anticipates that concerns regarding coexistence between radio and non-radio end-user equipments using licensed and license exempted spectrum bands will be tackled through a 360° analysis. This will enable all electronic communications operators to participate in the market on a level playing field and avoid that existing operators are unnecessarily impacted by new spectrum users in a particular band.

² Mandate to CEPT (2013)317781 to develop harmonised technical conditions for the 694-790MHz ('700MHz') frequency band in the EU for the provision of wireless broadband electronic communications services and other uses in support of EU spectrum policy priorities of March 11th 2013