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**Nokia response to the public consultation on the draft RSPG opinion on EU spectrum policy implication on the digital dividend**

Nokia welcomes the opportunity to respond to the public consultation on the draft RSPG opinion on EU policy implication on the digital dividend.

Nokia is a world leader in mobile communications, driving the growth and sustainability of the broader mobility industry. Nokia connects people to each other and the information that matters to them with easy-to-use and innovative products like mobile phones, devices and solutions for imaging, games, media and businesses. Nokia provides equipment, solutions and services for network operators and corporations.

Nokia supports the RSPG definition of the digital dividend<sup>1</sup>. RSPG position to increase flexibility and efficiency in the usage of the digital dividend is supported as well.

The RRC-06 plan facilitates the operation of mobile TV and at least one UHF coverage should be made available for these applications in the short term. Mobile TV using DVB-H does not require a dedicated sub band, any frequency within the band 470 – 750 MHz can be used. The frequency band 750 – 862 MHz is not optional for the co-existence of DVB-H and GSM900 in the same terminal. The possible interference issues between the broadcasting stations with different power levels can be handled by site engineering.

Nokia supports the urgent studies within CEPT on the future use of the digital dividend but this should not lead to delays in introducing new innovative services, like mobile TV, in the broadcasting bands. Segmentation of the band for different type of operation (terrestrial fixed/portable broadcasting, mobile broadcasting and mobile) could improve significantly the possibilities to introduce other than traditional broadcasting services in the band.

- Harmonization of a common sub band for mobile use, including uplink and downlink, is supported. The sub-band should be paired and of the order of 2x tens of MHz, minimum being 2x 30MHz, to facilitate sufficient competition and multiple operators. Paired spectrum (with FDD-technology) is required to be able to benefit from the better propagation conditions and thus wider operation distances of the lower band.
- Mobile TV with DVB-H does not require a dedicated sub band but it is noted that a harmonized band can help the interference issues related to the operation of broadcasting stations with very different power levels. This harmonization is considered as a longer term issue and should not impact to the possibility to implement mobile TV use today.
- Also, the possibilities to benefit from the developments in TV technology, such as more advanced content coding systems (MPEG-4) and more efficient channel coding systems like DVB-T2 /AMT initiative, should be carefully studied.

It is noted that the sub band harmonization and segmentation may require frequency reshuffling and the licenses in the band 470 – 862 MHz should take into account that e.g. the operating frequency or some other conditions in the network may need to be changed.

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<sup>1</sup> The digital dividend is understood as the spectrum made available over and above that required to accommodate the existing analogue television services in digital form, in VHF (band III: 174 – 230 MHz) and UHF bands (bands IV and V: 470 – 862 Hz).