



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

EICTA welcomes the opportunity to respond to the public consultation on the draft RSPG Opinion on EU spectrum policy implication on the digital dividend. EICTA generally supports the RSPG views as reflected in the Opinion document and the related CEPT studies as they aim to optimize the overall societal and economic value associated with the digital dividend. EICTA believes that consensus and commitment within the EU is important to:

- Encourage transparency of Member States policies and support convergence of approaches,
- Ensure that the digital dividend will contribute to EU-wide competition and foster innovation,
- Support the growth of the Internal Market for Electronic Communications Services¹ operating in the released frequencies resulting from the switchover to digital broadcasting,
- Stimulate the growth and strengthen the competitiveness of the audiovisual and multimedia content creation industries in Europe. In particular, content suitable for:
 - Use on home appliances, an increasing portion of which supports High Definition
 - Use on personal and portable devices, building on the leading position of Europe in Mobile Television and other multimedia applications

EICTA supports the objective to harmonize the spectrum of the digital dividend across the whole of Europe. EICTA recommends, in line with its position² on the review of the EU Regulatory Framework, that the proposed new spectrum management approach should be applied carefully in the case of the Digital Dividend and that harmonization, technology neutrality and service neutrality should be adequately addressed.

RSPG defines the digital dividend to be the spectrum made available over and above that required to accommodate the existing analogue television services in a digital form, in VHF (band III: 174-230 MHz) and UHF bands (bands IV and V: 470-862 MHz) and suggests that possible usage includes broadcasting as well as non-broadcasting services. In its Communication COM(2005) 461³, the Commission states that “if analogue TV

¹ Electronic Communications Service is defined in Article 2 of the Framework Directive and comprises telecommunications and broadcasting transmission services

² http://europa.eu.int/information_society/policy/ecomms/doc/info_centre/public_consult/review_2/comments/eicta.pdf

³ “Radio spectrum availability in the context of the digital switchover and the upcoming ITU Regional Radiocommunication Conference 2006 (RRC-06)”

broadcasting is switched to digital transmission (same image resolution and size, same number of channels), three to six times less radio spectrum will be needed. This means that some 300 to 375 MHz of the current amount allocated to terrestrial broadcasting could be freed and become newly available”.

Following the above understanding of the digital dividend, EICTA' s view is that the broadcast spectrum band 470 – 862 MHz, should be made available in a flexible and spectrum efficient manner primarily allowing opportunities for broadcasting as well as for non broadcasting services. Altogether the following aspects should be taken into account:

- Terrestrial High Definition TV (HDTV) content and service are crucial stimuli for the creative industry (broadcast, advertising, entertainment, games) and a source for new highly skilled jobs which is a main goal in the i2010 initiative. The creative industry is recognized in the i2010 initiative for its high growth potential and the increase of its contribution to the Gross Domestic Product (GDP). Terrestrial HDTV enables European citizens to access high quality digital content and services which closes the demand-supply loop. Spectrum efficient coding schemes (e.g. MPEG4) should be implemented as soon as possible. Other new programming and content formats enabled by digital technology, such as interactive applications could be introduced taking full advantage of innovative mobile/broadcast convergence technologies.
 - Mobile broadcast is an important new service that will foster growth and innovation in Europe. EICTA expects substantial EU-wide market demand and business opportunities around 2008 and favors, therefore, a spectrum allocation policy that sustains fair competition in term of technology and service provision without precluding specific technology options. As proposed by RSPG in its Opinion on multimedia services, adequate spectrum in the digital dividend should be made available for two multiplexes per country. The harmonization of a UHF sub-band for high field strength mobile broadcast services would permit improved terminal performance, reduced network costs and improved compatibility with fixed reception broadcasting. EICTA supports the RSPG request for urgent CEPT studies to address this issue, this should not, however, delay the introduction of mobile broadcast services.
 - Bi-directional communication applications (both fixed and mobile) could be introduced in the digital dividend with a harmonized paired band plan. The downlink part of this pairing may be larger/smaller for asymmetrical operation. This would facilitate a cost efficient extension of rural coverage, affordable infrastructure for sparsely populated areas, multimedia multicasting to large user groups and improved high speed coverage. EICTA supports RSPG view that this
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would be facilitated by complementing the current broadcasting/fixed allocation with a mobile service allocation for ITU Region 1.

EICTA's view is that for frequency allocations of the digital dividend, the new approach of spectrum management should be applied carefully. This new approach which is to be adopted in 2007 through the review of the EU regulatory framework will adequately address harmonization, technology neutrality and service neutrality.

In conclusion, EICTA generally supports RSPG Opinion on EU spectrum policy implication on the digital dividend. Likewise, EICTA recommends that the related CEPT studies identified in the Opinion should be conducted in ECC Task Group 4 with urgency in order to define and adopt the appropriate technical harmonization measures for the digital dividend, as mandated by the RSC.

EICTA MEMBERSHIP

About EICTA:

EICTA, founded in 1999 is the voice of the European digital technology industry, which includes large and small companies in the Information and Communications Technology and Consumer Electronics Industry sectors. It is composed of 59 major multinational companies and 37 national associations from 27 European countries. In all, EICTA represents more than 10,000 companies all over Europe with more than 2 million employees and over EUR 1,000 billion in revenues.

The membership of EICTA:

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