

## **German MNO response to the public consultation on the Draft RSPG opinion on EU Spectrum Policy Implications of the Digital Dividend**

The German mobile network operators T-Mobile, Vodafone D2, E-Plus and O<sub>2</sub>(Germany) welcome the opportunity to respond to the public consultation on the Draft RSPG opinion on EU spectrum policy implications of the digital dividend and provide the following comments for consideration.

We fully support the RSPG approach to facilitate a European spectrum policy for the VHF and UHF bands by taking the opportunity of the digital switch-over to introduce a more efficient and flexible use of the bands so far used for terrestrial broadcasting and to provide an opportunity to assign parts of that spectrum for new mobile applications.

### **The digital dividend**

The German MNOs share the understanding of the RSPG, that the digital dividend consists of 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 IV and V (470 – 862 MHz) following a complete switch-off of analogue television.

It is important, that discussions about the future use of the digital dividend are based on a digital transition of the existing analogue television services only. The potential increase of the number of TV channels or the introduction of additional local / regional TV channels (as already realised in Germany and some other EU countries) should only be considered as one possible option on an equal basis with the other options as mentioned in the Draft RSPG opinion for the future use of the digital dividend.

### **The future use of the digital dividend**

Four possible options for the future use of the digital dividend can be derived from the Draft RSPG opinion:

1. Increase the number of TV channels
2. Increase the quality of the current TV channels (e.g. HDTV)
3. Introduction of mobile broadcasting (e.g. DVB-H)
4. Introduction of new mobile broadband services (e.g. UMTS)

We consider it essential that a certain part of the digital dividend is assigned for nationwide mobile broadcasting services (option 3). RSPG should encourage Member States to make available a suitable part of the spectrum as soon as possible for mobile TV solutions. The full availability of the digital dividend is expected at the EU level for 2012, while certain countries are able to finalize the switchover even earlier. The mobile TV spectrum discussions in Germany might be taken as an example that even under the very complex conditions of a federal state system a spectrum solution for mobile TV is feasible by giving such use the necessary priority to overcome existing restrictions. Therefore, the ongoing transition to

digital broadcasting should not block the introduction of innovative mobile TV services where spectrum is effectively available.

Additionally a harmonised sub-band should be assigned at least EU-wide for new mobile broadband services (option 4). Once these objectives have been met, parts of the digital dividend could also be considered for increasing the number of TV channels (option 1).

In our view, the digital dividend should only be considered for option 2 once the three other options have been fully addressed, since improvements in quality of existing TV services will emerge in the future through evolved broadcasting technologies and do not necessarily have to be realised by increasing the amount of spectrum used.

Furthermore, the digital transition of the existing analogue TV services should make full use of both the VHF and UHF bands as these bands were the basis for the RRC-06 and form the GE-06 plan. Any relocation of existing digital TV services (e.g. from VHF to UHF) should only be considered on a secondary basis once the above mentioned options 3, 4 and 1 have been fully addressed.

In this respect we welcome that CEPT has already taken up option 4 by establishing ECC Task Group 4 to study the possibility to harmonise a sub-band of the digital dividend for mobile services.

Assigning a harmonised sub-band of the digital dividend for cellular mobile broadband services would ensure the highest degree in terms of economic use as well as efficient utilisation of the spectrum and would thus facilitate meeting the goal of the Lisbon agenda to avoid a digital divide in Europe.

The German MNOs support the necessary steps like compatibility studies and the identification of a harmonised sub-band at CEPT and ITU level. As mentioned above, the work of ECC TG4 will form an important part of this activity.

Regarding the ITU preparatory process for WRC-07 and the conference itself, we believe that it is important that the Commission and the EU member states take adequate steps to achieve the above mentioned objectives. In this respect the UHF band should be considered for mobile broadband services under Agenda Item 1.4 (Future spectrum demand for IMT-2000 and systems beyond) as well as under Agenda Item 7.2 (Draft agenda for the WRC-10/11 conference).