

Radio Spectrum Policy Group
European Commission
Information Society and Media Directorate-General,
BU33 7/09
B-1049 Brussels

LS,

KPN welcomes the opportunity to anticipate on the RSPG opinion concerning the EU spectrum policy implications of the digital dividend.

KPN operates T-DAB and DVB-T networks in the Netherlands and is preparing a launch of a DVB-H network. KPN and his subsidiaries also operate 2G and 3G mobile networks in the Netherlands, Germany and Belgium.

In general KPN has the opinion that because of difference between European countries in the available digital dividend and the requirements of local markets, each country needs to decide on how to use its available digital dividend. Therefore no mandatory rules should be established on the usage of the digital dividend.

Specific KPN comments are listed below for the items as indicated in section 4 of the draft RSPG Opinion.

- 4.1 In the Netherlands analogue switch-off took place on 11 December 2006. At RRC-06 seven layers have been obtained in UHF for the Netherlands. Licenses have been given for five nationwide multiplexes. KPN is of the opinion that also the remaining two layers should be used for enhancing the broadcasting service or for mobile TV.
- 4.2 KPN believes that reference to WAPECS should be avoided as long as the WAPECS concept still needs clarification and further elaboration.
- 4.3 KPN has the opinion that in particular TV for mobile and handheld reception using the DVB-H system is a new innovative service for use in the UHF band. KPN therefore

supports the initiative of Commissioner Reding for launching the EMBC (European Mobile Broadcasting Council) to prepare a roadmap for successful introduction of mobile TV.

4.4 Agree.

4.5 Agree.

4.6 Agree.

4.7 Agree.

4.8 Analogue TV has already been switched off in the Netherlands. KPN is in favor of studies to facilitate effective use of the spectrum. However sub-bands for certain reception modes should not be mandatory and should not affect existing operational networks. Moreover KPN does not consider that difficulties arising between networks for rooftop, portable, mobile multimedia are of major importance. The GE06 Agreement has sufficient flexibility to cope with the regulatory aspects in particular as the Dutch Plan entries are specified for RPC2. Technical problems resulting from different networks can be solved locally and do not require international regulatory measures.

4.9 KPN agrees that no particular actions are needed at EU level for the band 174-230 MHz, but KPN welcomes the CEPT actions to study consequences of using a DVB-T allotment by T-DAB assignments.

4.10 KPN has the opinion that the current de-facto sub-band for DVB-H of channel 21-55 is sufficient. A smaller sub-band, although favorable for terminal design, would limit too much frequency planning flexibility. Therefore KPN sees no need for urgent studies.

4.11 KPN has the opinion that the UHF band should be used for enhancing broadcasting services including DVB-H. Therefore KPN sees no need for studies for the possibilities for sub-bands for mobile services.

4.12 KPN underlines the benefits of MPEG4. However MPEG 4 is difficult to implement when DVB-T services with MPEG2 have already been launched. Nevertheless the introduction of MPEG4 should be considered. The extra capacity is urgently needed to improve reception quality in particular to improve picture quality for flat screens. This type of screens require about twice the bitrate compared to CRTs for an acceptable video quality, even for Standard Definition.

4.13 An exclusive sub-band for mobile services would mean that GE-06 Plan entries in that sub-band would have to be deleted and a time consuming replanning process for the remaining part of the band would be required although it is not guaranteed that the coverage of existing digital TV services would be maintained.

The use of guard bands (unused spectrum) to accommodate non-broadcasting services with uplinks is not an efficient use of valuable and scarce spectrum and up links should therefore not be pursued.

With kind regards,



S.C. Enzler,
KPN Corporate Legal & Regulatory