

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

Nortel is pleased to respond to the public consultation on the draft RSPG Opinion on EU spectrum policy implication on the digital dividend. Nortel supports the RSPG Opinion on EU spectrum policy implication on the digital dividend and offers the following comments.

Spectrum usage needs to be more adaptable to meet demand

The demand for radio spectrum seems insatiable so the procedures for coordinating spectrum access must continue to develop more flexibility. It is not certain today which technologies and which services will have enduring value for the consumer. Thus the development of new technologies and services must not be held back by processes for spectrum allocation.

Nevertheless the new processes must be careful to accommodate existing spectrum users. Existing technical and business plans must not unduly be disturbed as a result of new technology-neutral and service-neutral spectrum allocation processes. However future users of spectrum must play their part in the more efficient, more dynamic world by planning their networks and businesses accordingly. Innovations in specifying suitable new spectrum access schemes will develop in response to new processes.

Achieving economies of scale

The costs of providing technology and service must continue to fall. Thus economies of scale must be invoked. This can be encouraged by coordination at Community level. However coordination between the EU and other regions, such as the US, may help further where this is possible. Thus Nortel encourages EU Member States to take as broad as possible a coordinated view to ensure that the digital dividend will contribute to EU-wide competition and foster innovation.

Broad coordination may possibly not imply completely common allocations by all EU Members States as long as the needs of equipment manufacturers to manufacture multi-region equipment are considered.

Dealing with service-specific issues

Even with the latest technical developments in radio access, it can be seen that wireless is not fully service neutral. Different radio frequencies still have different geographical coverage properties which have to be taken into account.

Although VHF and UHF are both covered by the digital dividend, we consider here UHF only. We would encourage EU Member States to consider the benefits to consumers and industry of coordination on the following applications, over and above their existing coordination over broadcasting in the 470 – 860 MHz band.

Mobile applications: The upper part of the 470 – 860 MHz band provides relatively short wavelengths suitable for multi-service mobile devices. Coordination to ensure a large unified market in this region would be very welcome and would contribute strongly to EU competitiveness.

Fixed applications: The lower part of the 470 – 860 MHz band provides propagation suitable for fixed or nomadic devices. This could be particularly effective for rural services to complement existing broadband wired access technologies. Common technology deployed across the EU would particularly help to ensure cost-effectiveness, which could be encouraged by suitable coordination.

Conclusion

In conclusion, Nortel supports the RSPG Opinion on EU spectrum policy implication on the digital dividend. We encourage coordination specifically on non-broadcast services to meet broad EU market needs and encourage EU competitiveness and innovation.

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