



QUALCOMM Europe Inc  
40 Rue d'Oradour sur Glane  
75015, Paris

---

Paris, 15<sup>th</sup> December 2006

M. Francois Rancy  
Chairman  
Radio Spectrum Policy Group

**Subject: QUALCOMM response to the RSPG consultation on EU spectrum policy implications on the digital dividend**

QUALCOMM welcomes the opportunity to respond to the public consultation on EU spectrum policy implication on the Digital Dividend and highly appreciates the work undertaken by the Radio Spectrum Policy Group to enable the establishment of a common European approach for the future use of the Digital Dividend.

**QUALCOMM believes that the harmonization of a pan-European UHF sub-band for mobile broadcasting services, accommodating a minimum of two national layers per country, will allow achieving the European policy objectives and regulatory principles as defined in Article 8 of the Framework Directive**, requesting National Regulatory Authorities to *“promote competition in the provision of electronic communications networks, electronic communications services and associated facilities and services by [...] encouraging efficient investment in infrastructure, promoting innovation and encouraging efficient use and ensuring the effective management of radio frequencies”*.

QUALCOMM is of the view that the future success of the Mobile TV nascent market necessitates the establishment of a regulatory framework and an associated spectrum management regime that address the specific characteristics of this new service which requires important investments, specific content production, new value chains, variable business models and the deployment of broadcasting networks providing high quality of service and indoor coverage.

From a policy and regulatory perspective, the harmonization of a pan-European UHF sub-band for mobile broadcasting services will allow the use of the Digital Dividend for *a new innovative broadcasting service* and enable Member States to allocate and assign spectrum within the harmonized sub-band to the mobile broadcasting network operator on the basis of *“objective, transparent, non-discriminatory and proportionate criteria”*, in line with Article 9 of the Framework Directive.

From a technical and economical perspective, the harmonization of a pan-European UHF sub-band for high field strength downlink services will allow taking benefit from an optimized mobile broadcast network configuration, improved devices performances leading to cost efficient network deployment, enhanced coverage and quality of service, reduced equipment complexity and improved compatibility between fixed and mobile broadcasting networks and receivers.



QUALCOMM Europe Inc  
40 Rue d'Oradour sur Glane  
75015, Paris

---

QUALCOMM supports RSPG Opinion in calling for urgent CEPT studies to address the identification, at pan European level, of a sub-band of the UHF band for mobile broadcasting services. It is noted that ECC established, in December 06, a special Task Group, called ECC TG4, in charge of conducting these studies and providing its report to the European Commission by April 2007. **Taking into account the immediacy of switchover in some Member States and the consequential narrow window of opportunity for decisions on the use of the Digital Dividend in Europe, QUALCOMM invites the Radio Spectrum Policy Group and the Radio Spectrum Committee to build on CEPT conclusions to adopt in 2007 the appropriate spectrum decisions to enable a successful development of mobile broadcasting services in Europe.**

For any further information, you can contact Wassim Chourbaji, [wassim@qualcomm.com](mailto:wassim@qualcomm.com), +33 1 40 60 40 66, Senior Manager, Government Affairs Europe.

Best Regards,

Isabella de Michelis di Slonghello  
Sr. Dir., Government Affairs Europe  
[idemiche@qualcomm.com](mailto:idemiche@qualcomm.com)