

## **Telecom Italia response to the RSPG public consultation related to the draft Opinion on 'EU Spectrum Policy implications of the Digital Dividend'**

Telecom Italia (hereinafter TI) welcomes the Radio Spectrum Policy Group invitation to express comments and views in relation to the draft RSPG Opinion on the digital dividend.

Indeed, this is an issue of utmost importance, taking into account, on the one hand, the necessity of optimizing the use of frequencies which will be released with the switch-over from analogical to digital TV and, on the other hand, considering the opportunities for the development of new multimedia services.

Concerning this topic, TI would like to comment in particular on the following two type of services, both included in the RSPG's list of Digital Dividend possible alternative uses:

- Mobile broadcasting services
- Mobile services

### **1. Mobile broadcasting services**

The Digital Dividend is of high interest for applications of mobile broadcasting in DVBH technology. In this scenario, TI considers useful to identify a common part of spectrum, harmonised at EU level, for offering these services, taking into account the advantages related to the performances of the receiving terminals, the decrease of net costs, the improvement of compatibility with other broadcast services and the elimination of the risk of interferences with mobile communication services provided on 900 MHz band.

From the beginning of the transitional phase, mobile operators should already be allowed to use broadcasting frequencies for mobile TV services and digital content diffusion, in a flexible way and according to market needs.

### **2. Mobile Services**

TI also agrees with the RSPG Opinion in considering the interest of the Digital Dividend for mobile services.

In this case it is necessary to individuate a UHF part of spectrum (sub-band) harmonized at a European level. To that end, it has to be considered that the regulatory framework defined by in the Geneva Agreement 2006 is not enough, but the following steps are needed:

- In case it would not negatively impact on the development of broadcasting services, the WRC-07 can assign the 470-862 MHz band also to the Mobile Service and adopt a Resolution which invites the ITU to start the study activities on the harmonized sub-band for the future use by mobile services;
- The WRC-10 will definitely assign the identified sub-band to the mobile service.

The use of VHF and UHF spectrum for mobile services requires, in fact, the set up of a regulatory and technological glide path by the appropriate international bodies (CEPT, ITU, etc.) in order to define the conditions at which it will be possible to extend the use of parts of broadcasting bands to mobile services.

In every case, this glide path will not be effective before the analogue switch-off.

After the switch-off, it will be up to the market to decide whether to increase the mobile services offer, or if it would be more appropriate to maintain the use of the interested spectrum for broadcast diffusion services of digital contents.