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Comments from METIL to the Consultation on Wireless Access Platforms for Electronic Communication Services of the Radio Spectrum Policy Group

Consultation question 1: Do you agree with this operating definition of WAPECS? Do you consider that the WAPECS concept should include spectrum intended for private, as well as public, applications?

The term “Interactive Broadcasting”, concerning the DTT, is ambiguous and must be defined. From the provided text, we assume that you are referring to the “Off-line interactivity”. However, the one-way television (without a reverse path), is marginally the subject of WAPECS. On the contrary, the real interactive television (with reverse path configurations) allows the convergence and synergy among all other partial platforms that are included within the WAPECS scheme, and therefore can constitute a key element of the WAPECS.

Consultation Question 3: What, if any, constraints should there be on the provision of services using spectrum primarily in the broadcast domain?

METIL anticipates that should be no constraints on such an issue. Contrarily, many constraints already exist for the provision by the broadcasting domain of services that are currently provided by the telecom operators. That means that many objections exist for the deployment of the real interactive television (DTT with reverse path) for delivering novel services (such as broadband Internet access, multimedia on demand, broadband networking, etc.), which until now the one-way television can not deliver. The way that the digital switchover in UHF (DSO) is adopted/applied/permitted until now (one-way TV with off-line “interactive” services), makes the existence of DTT marginal within the general concept of WAPECS (see also response to question 1).

Consultation question 8: Are there any other long term policy goals that the RSPG should consider?

METIL considers of strategic importance the formation and support of a policy that will enable the synergy (better than convergence) between the broadcasting and telecommunication sectors and will set the basis for the common spectrum exploitation/sharing for their mutual benefit. Such a policy has been suggested by the IST, in the document entitled “Alternatives for extending broadband coverage to underserved EU regions, in the context of the Digital Divide Forum”, (October 2004, EC Contact person Paulo de Sousa Head of Sector, DG Information Society). In paragraph 5.10 of this document it is stated that backhaul systems making use of the DVB-T technology can constitute a low-cost solution extending broadband coverage to underserved EU regions. METIL anticipates that such backhaul systems (as suggested by IST) can be realised only with the strong synergy between telecom and broadcasting sectors for their mutual benefit.

For the METIL Telecom Consultants

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