

ETNO Expert Contribution on the introduction of Multimedia Services in particular in the frequency bands allocated to the broadcasting service – RSPG Opinion

Executive Summary:

ETNO generally supports the ideas proposed by RSPG to facilitate the introduction of multimedia services in the European Union.

All radio technologies operating or intended to be deployed in the frequency bands mentioned in the draft RSPG Opinion are considered to have the potential to be used for the delivery of multimedia services. A coherent authorisation scheme, ensuring competition on a level playing field needs to be implemented. Harmonised use of broadcasting frequencies at the European level should be favoured, allowing the availability of low cost terminals.

Introduction

ETNO is pleased to respond to the public consultation on the draft RSPG Opinion on the introduction of Multimedia Services in particular in the frequency bands allocated to the broadcasting service. ETNO represents the voice of 40 of Europe's largest, well established telecommunications operators in 34 countries, providing a number of different services ranging from traditional fixed line telecommunication services to mobile telecommunications, content provision and Internet services.

Nowadays, new technologies allow viewers to receive audiovisual content - which was previously only accessible via television - through different platforms such as mobile networks, broadband wireless access systems, cable TV, or DSL. Furthermore, content is of increasing importance in the value chain. The creation and distribution of broadband multimedia content and services requires investments, support and creativity from industry, including platform providers, application and content providers, telecom operators, regional organisations and administrations.

Comments on frequency bands

ETNO considers that all radio technologies operating or intended to be deployed in the frequency bands mentioned in the draft RSPG Opinion have the potential to be used for the delivery of mobile multimedia services. The 470-862 MHz band is apparently the most favourable band for this. Coexistence studies should be carried out prior to the assignment of frequency space for mobile multimedia services.

ETNO operators are already providing multimedia and audiovisual contents to customers through the use of their UMTS/IMT-2000 or DAB networks. In addition, they are participating in experiments and trials in order to evaluate the potential of mobile multimedia services via technologies such as DVB-H or DMB.

In order to respond to customers' expectations, the short-term development of mobile audiovisual services via UMTS/IMT-2000 streaming seems to be the most popular solution. Nevertheless the efficient combination of mobile and broadcast technologies (e.g. UMTS/IMT-2000 and DVB-H) has to be studied at the European level in order to harmonise introduction of coordinated European broadcast solution. Technical implications would be limited if technologies to which the frequency bands are designated are compatible with their current use. This would allow an immediate introduction of mobile multimedia services without any delay due to the need of coexistence studies. Moving to alternative technologies might take place progressively.

The ways the customer access audiovisual contents should diversify in the near future with the development of non-linear contents in relation with the development of new modes of watching (e.g. mobile TV via DVB-H) and having interactivity via IP based technologies such as UMTS/IMT-2000. Those different modes of consumption should develop and exist in parallel, using appropriate technologies in a complementary way. Therefore, the broadcast concept should be considered more flexible and beyond traditional broadcasting in order to accommodate new forms of transmission to multiple recipients, thus enabling other non-traditional broadcasting services access the bands currently allocated to broadcast.

Harmonising the conditions within the EU for accessing these bands (understood in the wider sense) is highly desirable. Due to the ongoing transition from analogue to digital TV in Europe, a part of the spectrum presently still used for broadcasting might become available for other uses, and in particular, for mobile communications. ETNO believes that it would be highly desirable that this spectrum is harmonised throughout Europe.

ETNO believes that using the full potential of the digital dividend will support the EU reaching its i2010 initiative goals of breaching the digital divide and increasing access to broadband services. In this sense, ETNO shares RSPG's view that it should review unnecessary constraints in current licenses for broadcasting, mobile and fixed services to enable the introduction of mobile multimedia services.

Before radio spectrum is made available - in particular for new services - the effects on existing telecoms markets and frequency usages have to be carefully analysed. A coherent authorisation scheme, ensuring competition on a level playing field needs to be implemented. Harmonisation of the use of frequency bands based on a selection of a limited number of technologies should be favoured, allowing the availability of low price terminals. In that respect, the current initiative of the European Commission aiming to foster the development of DVB-H in the VHF/UHF bands is supported by ETNO.