

“CONSULTATION MULTIMEDIA SERVICES”

Comments on the Draft RSPG Opinion on “The Introduction of Multimedia Services in Particular in the Frequency Bands Allocated to the Broadcasting Services” dated May 11, 2006

Dear Ladies and Genlemen,

in the drafted report mentioned above, RSPG asked for comments.

Firstly, I may introduce Delphi and explain its interest in the RSPG consultation on broadcasting frequencies:

Delphi is one of the major supplier to car industry. Car radios, navigation sets, antennas to car manufacturers and the open market are part of its portfolio.

Delphi and its subsidiaries have efficient production sites and customers for these products in Europe. Consequently, Delphi is strongly interested in innovations and the development of the European market.

As published at the CeBit 2006, already Delphi became a strategic partner and a minority shareholder of ONDAS Media S.A. ONDAS is a Madrid-based, pan-European media company founded in 2004. It expects to become Europe's first and premier digital satellite provider of subscription-based multilingual text, music, video, telematics and other data services via 4 satellites in “Highly Elliptical Orbits” (HEO).

The services are addressed primarily to moving vehicles and handheld mobile devices. It is Delphi's interest to provide industry with receivers for these services as Delphi successfully does in North America for satellite services available there already.

We read the RSPG-Draft of May 11, 2006 with great interest and do support/agree with most of the points mentioned.

But there remained some concerns on the topics and points mentioned the Annex to this letter. We would be very interested if RSPG could consider these in its final version of the Draft.

We would be glad to explain our position personally to RSPG at any time wanted. In case you feel that this may be helpful, we would be glad to get a date.

With very best regards

Delphi Electronics & Safety
FUBA GmbH & Co KG

Dr. Andreas Hunscher
Managing Director

Enclosure: 1 ANNEX

“CONSULTATION MULTIMEDIA SERVICES”

Delphi’s Comments on the Draft RSPG Opinion on “The Introduction of Multimedia Services in Particular in the Frequency Bands Allocated to the Broadcasting Services” dated May 11, 2006

1. Definition of “Multimedia”

The common understanding and use of the term “multimedia” in science and industry is at least for digitally encoded services:

“Multimedia services mean any information service or any combination of services which are otherwise or have been formerly separated and were transmitted on different ways.”

This means that we understand “multimedia” as “any combination of some or of all of the services for text, voice, music, still frame pictures, video and/or TV, data”.

In this sense multimedia is just not necessarily a combination of broadcasting (point to multipoint = one way services) and regular communication services (point to point services = person to person services = two way services) as mentioned in the draft.

Mere broadcasting is as well included in the term “multimedia” as any combination of one-way- or two-way-services.

Consequently, the exclusivity expressed in the sentence in the RSPG-Draft on page 3, 3rd break “Multimedia services are seen as the coming together of the traditional broadcasting (point-to-area-coverage) and communication services (one-to-one)” should be altered. Otherwise it could and would be understood as a devaluation of broadcasting-only services. Because broadcasting of multimedia content is necessarily cheaper than a service with reverse channel capability and is therefore an important economical factor to any country and its population.

So, the sentence should read instead as proposed above:

“Multimedia services mean any information service or any combination of services which are otherwise or have been formerly separated and were transmitted on different ways.”

2. Data compression

The draft does not mention one of the most important possibility for more services in the broadcasting bands III, IV, V and L-Band: Use of the most modern, the most efficient and within ISO internationally agreed compression standards: MPEG-4 and AAC (as used for DMB and DVB-H, already) instead of those actually in use for T-DVB and T-DAB.

European countries have not finished the transformation from analogue to digital, so it is already discussed quite often to apply these more efficient standards eventually – at least when new frequency allocations will be realized after RRC 06 and/or when new digital services are started.

We strongly recommend to mention this option because it can really earn a “digital dividend” – more and easier than many other proposals.

In the long term this could be less disturbing to already established markets, too, than changing the dedication of frequencies again and again and/or disregard some of the clear statements as laid down in the Wiesbaden or Maastricht plans.

3. It should be mentioned that broadcasting frequencies which are not asked for broadcasting services when publicly offered, may be given regionally to other users such as providers of

satellite services. Priority to terrestrial broadcasters can be ensured when the licences are granted for limited times (e.g. 10 – 15 years).

4. Dedication of Band III-services to either TV or digital sound
(see page 4, point 3.1 of RSPG-draft)

The dedication to just these two services with either 7 MHz for TV or 1,75 MHz to sound does not consider that

- a. Multimedia in the sense of mixed services (see 1.) may use both types of bandwidths.
- b. MPEG-4 allows the necessary TV-quality even for big TV screens when using up to the full data rate possible within a 1,75 MHz-channel.
- c. The radiating power for band III-transmitters allowed and applied for DAB/DMB-services are actually often more limited than for TV. Most probably this anachronism will be removed by the RRC 06, but exists up to now. This limitation was applied when early power restrictions to DAB-allotments channel 12 were just taken over for all DAB blocks.

5. Frequencies for “Mobile Uplink”

To our opinion and recommendation, frequencies within the broadcasting bands II, III, IV, V, L-Band should remain strictly dedicated to broadcasting and not for “mobile uplinks”.

6. L-Band

The Wiesbaden plan allocated frequencies in the range of 1452 – 1472 MHz to T-DAB, the the Maastricht agreement extended it to 1452 – 1479,5 MHz.

To our opinion, at least **the range of 1479,5 – 1492 MHz should remain and dedicated exclusively to Satellite downlink services** (such as S-DAB) and it is recommended to maintain this under any conditions. But it may be allowable to a satellite downlink operator to use the same frequency terrestrially for gap-filling purposes in Single Frequency Networks (SFNs), i.e. for the same signal content terrestrially as from the satellite.

To protect satellite reception and to allow undisturbed services covering wider areas of Europe, the use of the frequencies between 1479,5 – 1492 MHz should not be extended to T-DAB with different content than applied in the downlink and/or to other terrestrial services.

Irrespective to this, satellite service provider wanting to extend their distribution regionally via terrestrial transmission should have the option to apply for frequencies in the range of 1452 – 1479,5 MHz or in Band III, too.

Therefore we do not see the Maastricht agreement as “unduly restrictive”. The provision should be maintained that the total 1452 – 1492 MHz-Band as well as Band III have been dedicated firstly to broadcasting. Just unused frequencies ought not be hoarded by classical terrestrial broadcasters but then given to Tele- and Multimedia-Service providers for a limited time.

It is recommended though, to use L-Band frequencies primarily for satellite downlink applications if a reallocation within international agreements may be possible. This may become true if enough Band III frequencies may be dedicated to T-DAB/DMB in future.

7. Delphi would be very supportive to the idea to consider other bands (e.g. 1980 – 2010 and 2170 – 2200 MHz) for broadcasting satellite downlink services.