

France Telecom Group comments on the introduction of Multimedia Services in particular in the frequency bands allocated to the broadcasting service – RSPG Opinion

France Telecom Group welcomes the opportunity to respond to the Radio Spectrum Policy Group consultation on the introduction of multimedia services in particular in the frequency bands allocated to the broadcasting services. France Telecom Group generally supports the ideas proposed by RSPG to facilitate the introduction of multimedia services in the European Union.

Orange is one of a number of mobile operators now offering customers access to audiovisual content through its handsets. Customers can access a wide range of video clip content and channels via Orange TV. The wide acceptance of new multimedia services by more than 2 million users of high data rate mobile services all over Europe shows that mobile networks are now an important medium for all multimedia applications. Indeed, Orange users have access to Orange World portal in France, the United Kingdom, Poland, the Netherlands, Romania, Slovakia and Switzerland. This portal offers, for instance in France, more than 50 live TV channels (2.2 million sessions per month) together with 3000 video programs and 500 new videos every week (5 million sessions per month). The vast majority of TV content accessed by mobile users at present remains, however, in the form of video on demand.

The market for TV over mobile is at a relatively early stage and is evolving rapidly. European mobile operators are keen to develop this very competitive and creative market by providing innovative new services and technologies. They are therefore developing new services, offering attractive content to customers and testing a number of technologies which would allow TV to be distributed to mobile phones in different modes. This means that an increasingly wide range of content – and means of accessing it- will become available over the coming years. France Telecom Group believes that the use of both IMT-2000/UMTS network and a dedicated broadcasting network may possibly constitute the most efficient basis to deliver mobile TV to end users. Indeed, IMT-2000/UMTS networks have the ability to offer unlimited channels to a limited amount of customers while broadcasting technologies work the other way around: a limited amount of TV channels can be delivered to an unlimited amount of customers. Thus, this is precisely this combined use of technologies that will enable mobile operators to offer the best possible content to European users.

As a consequence, France Telecom Group, which is committed to the future provision of TV over mobile, leads TDD trials with the other mobile operators in the UK and runs trials using DVB-H technologies in France, Spain and Switzerland. T-DMB technology is also tested in France, as well as the satellite solution known as DVB-SH. We believe that mobile TV will form part of the suite of interactive multimedia services which will allow customers to view their favourite programs and catch up with current events via their mobile handset whilst on the move.

However, France Telecom Group also notes that one of the main critical points faced when considering the potential deployment of these technologies is the status of the

associated frequencies (availability, associated regulatory framework...) as well as the conditions attached to the use of these frequencies (authorisations, content...).

Generally, we believe that a harmonised approach at European level in each frequency band would favour the development of these multimedia services, allowing in particular the availability of terminals at low cost. Indeed, although such a coordinated approach has already been envisaged in VHF and UHF bands when preparing and negotiating the Geneva-06 Agreement and associated Plan, France Telecom Group supports the idea that, in order to respond to customers expectations, short term developments (i.e. before 2012) of audiovisual mobile services should be targeted through appropriate regulatory decisions. Moreover, although we concur with the RSPG view that any approach to facilitate the development of multimedia services should be consistent with the Opinion adopted by RSPG on WAPECS, we would also like to stress that the WAPECS approach is a long term issue and that it should not affect short term developments of multimedia services.

Various frequency bands may be considered as candidates to develop new multimedia services, as mentioned by RSPG: 174-230MHz, 470-862MHz, 1452-1479.5MHz, 1479.5-1492MHz, and 1980-2010/2170-2200MHz. However they do not present the same status, advantages and disadvantages. Indeed, the L-band implies propagation constraints that would lead to an increase of the network cost while the VHF-band requires larger antennas which are not suitable for handheld terminals. Hence, France Telecom Group believes that the UHF band may be the most appropriate among the bands previously mentioned to deploy such networks enabling the development of multimedia applications (mobile TV and 3G/B3G) and would as a consequence strongly support a harmonised approach at European level in this particular band in the short term (2008-2009) in order to facilitate mobile TV deployment as well as to allow the development of 3G/B3G networks whilst avoiding harmful interference. Finally, with regard to the MSS 2 GHz band, we support the development of a harmonised regulatory framework at EC level.

We also believe that a coherent authorisation scheme, ensuring competition on a level playing field needs to be implemented. Furthermore, concerning mobile TV, France Telecom Group notes that on the one hand networks have to be extremely dense and as a consequence are expensive to deploy and on the other hand that business cases will probably not include high advertisement revenues, due to a different usage than on home televisions (shorter sessions, zapping...), therefore implying that a paying-TV model will probably have to be put into place.