

Response from the Belgian GSM Operators' Forum to the draft RSPG Opinion on  
"The Introduction of Multimedia Services in particular in the frequency bands  
allocated to the broadcasting services"

The Belgian GSM Operators' Forum (hereafter, "GOF") represents the three Belgian mobile operators. GOF is dealing with non-competitive issues related to the creation of a favourable environment for the development of mobile communication services by driving socio-economical issues.

The members of GOF welcome the public consultation launched by the RSPG and the possibility to respond to it. Overall GOF members are supporting the role of the RSPG to facilitate the introduction of multimedia services in the traditional allocated broadcasting bands (VHF-UHF).

**Digital dividend**

New technologies allow the end-users to access multimedia or audiovisual content through different ways. The market for TV over mobile is evolving rapidly. Therefore, an increased flexibility in the frequency bands, currently allocated to broadcasting services, is needed as to ensure a fair distribution in the perspective of the digital dividend and allow new forms of non-traditional broadcasting services.

**European wide harmonisation**

Market conditions (e.g. economy of scale) for take-up of the service will be influenced by factors like low cost terminals. These factors can be stimulated by:

- Harmonised use of frequency bands at the European level
- Limitation of a number of technologies within a level playing field.

Such a harmonisation is especially important, because GOF members are operating in a Belgian market that because of its size cannot bring about economies of scale.

**UHF bands for mobile multimedia TV services**

Amongst the frequency bands proposed by RSPG, UHF bands are the most appropriate bands to deploy and develop mobile multimedia TV services in Belgium and in Europe. The numerous field trials in Europe - also in Belgium through the MADUF project<sup>1</sup>, indicate the interest to evaluate the potential of mobile multimedia services on these bands. Therefore the GOF members recommend harmonising at European level at least one mobile broadcast service layer within these UHF bands.

**Spectrum scarce resource**

Spectrum is scarce. The same spectrum can carry 2 HDTV channels or can carry tens of mobile channels.

For countries, like Belgium, with a high penetration of fix infrastructure (cable TV, DSL...) GOF members would suggest that fix High Definitions Services, like HDTV, will preferably be carried over this fix infrastructure. This will make it possible in the short-term to reserve broadcasting bands for mobile TV services, as these are typically mobile and need this air interface.

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<sup>1</sup> MADUF (Maximize DVB Usage in Flanders) is a research project that explores the possibilities for mobile television through DVB-H and is co-ordinated by IBBT, the Interdisciplinary institute for Broadband Technology.