



GSME response to RSPG Opinion on  
'The Introduction of Multimedia Services in particular in the  
frequency bands allocated to the broadcasting services'

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GSM Europe  
Eirini Zafeiratou, Director GSME  
Diamant building  
Bd. Reyers 80  
B- 1030 Brussels  
Tel: +32 2 706 81 06  
GSM+ 32 478 31 98 07  
E-mail: [ezafeiratou@gsm.org](mailto:ezafeiratou@gsm.org)  
[www.gsmeurope.org](http://www.gsmeurope.org)



## **GSME response to RSPG Opinion on 'The Introduction of Multimedia Services in particular in the frequency bands allocated to the broadcasting services'**

### Introduction

GSME welcomes the opportunity to respond to the RSPG consultation on 'The introduction of Multimedia Services in particular in the frequency bands allocated to the broadcasting services' which considers ways to facilitate the introduction of multimedia services within Europe. GSME represents the interests of 86 European mobile operators. Following an invitation by the European Commission, GSME is a member of the Secretariat of the European Mobile Broadcasting Council which shall examine, among others, spectrum issues related to mobile broadcasting.

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. New services are being developed, offering attractive content to customers and operators are 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.

The European mobile operators are committed to the future provision of TV over mobile with many leading trials of different standards and technologies throughout Europe. In Italy, Telecom Italia and 3 Italy have launched a commercial mobile TV service in June 2006, using DVB-H in the 470 – 862 MHz bands. We believe that mobile TV will form part of the suite of future 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. At this time, the mobile operators are evaluating the results of the trials to assess the most appropriate technologies to pursue.

GSME agrees with the new services identified by the RSPG in their earlier Opinion (RSPG 04-55 Rev final) that could benefit from the switchover to digital broadcasting:

- increased number of programme services,
- higher quality services (e.g. HDTV),
- services delivered to portable or mobile receivers (e.g. via DVB-H), and
- electronic communication services (other than broadcasting), such as those based on mobile technologies such as UMTS/IMT-2000 and systems beyond IMT-2000.

However, in the meantime, mobile operators urge the EC and Member States to identify at least one national layer of 8 MHz for mobile multimedia services in the UHF band below 750 MHz prior to complete digital switchover of analogue TV.

GSME also believes that European administrations should allow increased flexibility of use to all frequency bands currently allocated to broadcasting services. Using the full potential of the digital dividend for electronic communication services other than broadcasting, for example, would support the EU reaching its i2010 initiative goals of breaching the digital divide and increasing access to broadband services.



GSME agrees with the RSPG that action is needed to review unnecessary constraints in current licences for broadcasting, as well as in mobile and fixed services to enable the introduction of mobile multimedia services. With regard to content regulation, GSME opposes any extension of the current rules for broadcasting to non-linear services (audio-visual) and any new obligations as foreseen with the TWF-Directive Review. Broadcast services should be strictly defined as linear transmissions, contemporaneously available to all viewers, where the content is under the control of the publisher. The definition should be platform-neutral. It should be underlined that the obligations of TWF do not apply to an operator acting as a carrier without any role in the editing/ publishing of the content, in respect of the principles of the E-Commerce Directive. The development of different but converging markets, which through their existence increase choice and diversity, should lead to deregulation instead of extending obligations from one market to another.

**GSME fully supports the introduction of a harmonised European Framework for the implementation of mobile multimedia services and below we consider the spectrum bands proposed by the Commission to enable the provision of such a service.**

#### 470 – 862 MHz (UHF bands IV and V)

GSME believes that access to digital dividend spectrum in these bands should be made available to all market players, ensuring that such access is on a level playing field, for example between both broadcasters and mobile operators. Full availability of the spectrum across Europe will ensure operators have the opportunity to offer common services across Europe.

A variety of technologies (e.g. DVB-H, UMTS/ IMT2000 and systems beyond IMT2000) can be taken into consideration for this band. However, the interference issues have to be resolved when different technologies are deployed in adjacent bands. Consideration should therefore be given by the Commission to ensure the channelisation of the bands is harmonised at a European level. GSME fully supports harmonisation of spectrum and the technology to minimise the interference issues leading to more efficient utilisation of spectrum.

As previously noted, GSME urges the EC and Member States to identify at least one layer of 8MHz for mobile multimedia services in the UHF band below 750MHz (UHF Band) prior to completion of the digital switchover.

#### 1452 - 1492 MHz (L-Band)

GSME believes that access to this spectrum should be made available to all market players.

The L-band is at a higher frequency which means that significant additional infrastructure would be required, particularly in rural locations (adding to the environmental impact), for a national mobile broadcasting service. It is important to GSME that mobile operators, do not discriminate against rural users of multimedia services, particularly as it is in rural communities that greatest benefit from the provision of multimedia services using the radio spectrum may be gained. Therefore,



we believe that further analysis of the public service benefits of the alternative bands should be undertaken as part of the consideration by the RSPG.

In addition, the handset portfolio available for multimedia broadcasting in the L-band is so far quite limited so we see this as a medium to long term solution.

GSME strongly believes that any amendment to the Maastricht Treaty necessary to enable this spectrum band to be used for the provision of multimedia services should be agreed and harmonised by the Commission. There will be little benefit for any operator to have a unilateral decision made in one country with regard to this spectrum.

#### Other frequency bands not allocated to the broadcasting service

In its draft Opinion, the RSPG considers the bands identified for UMTS/ IMT-2000 at 2 GHz and 2.5 GHz for the provision of multimedia services. Again, GSME believes that these frequency bands are too high in frequency for the implementation of a nationwide mobile broadcasting service.

However, all mobile operators are now offering multimedia services and these bands will be used, in conjunction with existing spectrum allocations licences held by the mobile operators, to provide multimedia services for the consumer. UMTS/IMT--2000 is already being developed to ensure the capability to provide mobile TV services and this will be incorporated into existing networks as appropriate.

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