

EICTA reply 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 services

Introduction

EICTA welcomes this consultation and the opportunity to respond and wishes to express the following views and concerns. It urges the RSPG to adopt this opinion before year-end since it is critical for the take-up of multimedia services that Europe moves ahead and creates the best possible regulatory conditions and certainty. The market has shown great interest in multimedia services but this alone cannot achieve the goal. Political commitment and consensus among member states is vital at this stage.

There are a number of terrestrial and satellite technologies that have the capability to provide mobile multimedia broadcast services. Examples of these include UMTS (FDD & TDD), DVB-H, MediaFLO, DMB, DAB, and Mobile WiMax.

- EICTA supports the harmonization of spectrum and this should be continued to be pursued across Europe
- The frequency band has a large economic impact. UHF (470-750 MHz) is the optimum. Going to L-Band would triple the network costs.
- The new spectrum management approach which is to be introduced through the Directives review process – expected to adequately address harmonisation, technology and service neutrality – should be applied to the digital dividend across the EU Member States.

UHF (470 – 862 MHz)

Wherever possible spectrum should be made available for mobile multimedia broadcast network(s) **prior to switch off date**. There are two particular concerns that might be useful to consider:

- Any spectrum designated to mobile multimedia should be in contiguous sub-bands harmonized in a pan-European arrangement;

- ✦ It is felt as extremely beneficial to have a mobile multimedia band in the lower part of the range 470-862 MHz. The highest supported frequency is 750 MHz due to interoperability reasons with cellular radio systems.

EICTA participants see a EU-market opportunity/demand around 2008 and favor a spectrum allocation policy that sustains fair competition in term of technology and service provision without precluding specific technology options. To this end at least two national multiplexes should be identified per country with one for a quicker allocation and the second for longer term availability. Any allocation should also be made with optimum regulatory flexibility in terms of technology choice, power level restrictions and interference protection so that stakeholder wishing to deploy those services can do so with maximized efficiency in terms of network and device cost while insuring protection to spectrum incumbents until the end of the DTV transition, but in a harmonized spectrum arrangement.

It is deemed extremely important to have Europe-wide harmonization of the spectrum to support mobile multimedia networks since this key issue needs to be addressed in the same way across Europe. Common and unique frequencies for mobile multimedia networks within a country, and ideally across Europe, improves indoor coverage, roaming, acquisition time, spectrum efficiency and also reduces costs, equipment and network deployment complexity, the number of transmit sites, cross border interference, etc. In addition an EU decision in this field would significantly influence positively the entire Region 1 allocation process for mobile multimedia broadcast services.

It is proposed that EC RSCOM considers issuing a mandate to CEPT/ECC to:

- ✦ Identify the appropriate spectrum layers taking into account results of the RRC-06 (minimum of two network coverages per country based on 8MHz channel raster each, harmonized across EU);
- ✦ In addition possibly identify a common up-link / return channel of about 40 MHz (5 x 8 MHz) and also a common corresponding down-link band of about 40 MHz (5 x 8 MHz), possibly in the lowest part of the range 470-862 MHz;
- ✦ Define the terms and goals of the relevant technical and interference studies necessary for each layer and start conducting the appropriate work;
- ✦ Estimate the timeline for availability of each spectrum layer and draft an appropriate supporting ECC decision;
- ✦ Build an appropriate regulatory and competition environment for spectrum award across Europe (both in term of technology neutrality and of service provision competition);

When considering allocations of frequencies of the digital dividend - **after the analogue switch-off** –, the new approach of spectrum management which is to be adopted in 2007 through the review of the EU regulatory framework should be retained.

- ➡ It would be contrary to this approach to pre-define that some bands of the digital dividend should be devoted to a specific category of technology.
- ➡ While it is clear that video is going to be a key driver of demand for broadband, it will be a component of many different applications.
- ➡ The RSPG opinion should not encourage Member States or the European authorities to jeopardize the benefits of a spectrum digital dividend by pre-reserving part of it for a specific service. EICTA encourages RSPG to stress that the new spectrum management approach – expected to adequately address harmonisation, technology and service neutrality – should be applied to the digital dividend across the EU Member States.

L Band (1452 – 1492 MHz)

- ➡ An examination of a general use of this spectrum for mobile multimedia broadcast networks is supported, particularly in light of the fact that this band is accessible in part by satellite-based solutions;
- ➡ Multiple mobile multimedia networks can be supported within this band and despite the extended propagation range enjoyed in lower frequencies. This band should be made for mobile broadcasting in densely populated areas in case no UHF-frequencies are available;
- ➡ Activities at the European level (EC / ECC) should be initiated after the RRC-06 to ensure that such spectrum is effectively used and optimized for new applications, whenever possible. Being a harmonized frequency band, it appears urgent to conduct such a review in a technology neutral fashion;
- ➡ The process for updating the channel arrangements for this spectrum should be conducted by the 1st half of 2007 and should be made in a manner appropriate for multimedia applications, taking into account the most recent developments in standardisation bodies.

- It is noted that in order to most effectively and efficiently support mobile networks the channelisation scheme developed under Maastricht should be reviewed/relaxed and nationwide channels should be made available.
- It is also noted that some of the mobile broadcast technologies currently operate at 5 MHz, 6MHz, 7 MHz or 8MHz channel bandwidths rather than 1.7 MHz which is currently detailed under Maastricht. Licensing of this spectrum should be designed to enable the option for both 1.7MHz and one of the other existing bandwidths in a efficient and generic manner. For example combining four 1.7 MHz T-DAB blocks would enable a 7 MHz variant (occupied bandwidth 6.66 MHz) to be used. This would minimize the wasted spectrum in a combined channelisation scheme.
- There is already a spectrum mask under Maastricht which is for T-DAB systems. This should be considered as the basis for other technologies taking into account the potential for larger bandwidths.

Additional note on a short-term flexible licensing framework

In its draft opinion, the RSPG considers that introduction of multimedia services could be facilitated in the short term by new or renewed licenses allowing the use of multimedia services and limiting the constraints and obligations to the minimum required. In this perspective, EICTA would like to stress the importance of a flexible licensing framework.

Mobile multimedia services should not be considered as traditional broadcasting, but as a combination of unicast and broadcast services.

- This combination enables the service provider to capture the long tail distribution of revenues. The optimal business model combines a limited number of contents with a high viewing frequency and a high number of contents which is viewed by small communities. This combination needs to be dynamic, particularly as these services are emerging.
- Consequently EICTA suggests that the RSPG opinion recommends a flexible licensing framework which enables such dynamic combination of broadcasting and unicasting. This point is important for the economic success of mobile multimedia services across Europe, as well as for an emerging European content industry specifically targeting a mobile audience.



About EICTA:

EICTA, founded in 1999 is the voice of the European digital technology industry, which includes large and small companies in the Information and Communications Technology and Consumer Electronics Industry sectors. It is composed of 57 major multinational companies and 36 national associations from 27 European countries. In all, EICTA represents more than 10,000 companies all over Europe with more than 2 million employees and over EUR 1,000 billion in revenues.

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