



BT comments on the RSPG draft Opinion #5:

**"The Introduction of Multimedia Services in particular
in the frequency bands allocated to the broadcasting
services"**

(Issued for comments on 11 May 2006)

**BT comments on the draft RSPG draft Opinion #5 :
“The Introduction of Multimedia Services in particular in the frequency
bands allocated to the broadcasting services”**

1. Introduction

BT welcomes the publication of this draft RSPG Opinion on the introduction of multimedia services and the opportunity to provide our comments on this important subject. The development of mobile multimedia services is evident in many parts of the world and it is essential that the appropriate regulatory conditions and opportunities are established in Europe that will enable operators to provide such services to European consumers.

2. Detailed comments

BT supports all of the main elements of the draft Opinion of the RSPG as contained in section 4 of that document.

We assume that the references to Multimedia Services throughout the document are intended to represent broadband wireless services, and particularly mobile multimedia services.

BT would propose that the first bullet in the introduction is modified as follows:

- Member States should, given the diversity in needs and objectives, be able to make available allocate any dividend to such services that best serve their demands in accordance with the technology neutrality and other relevant aspects of the EC Authorisation Directive.

BT would wish to draw the RSPG’s attention to the text of section 3.4 on the situation in other relevant frequency bands not allocated to the broadcasting service. We believe that this would benefit from some re-drafting to address two points of accuracy.

The first bullet in section 3.4 states that “The bands identified for IMT-2000 at 2 GHz and 2.5 GHz are available for that purpose throughout Europe ...”. This statement is misleading concerning the 2.5 GHz band because according to information published on the ERO web site only 7 EU Member states have implemented or committed to implement the CEPT Decision of March 2005 designating this band to IMT-2000/UMTS and, more importantly, France explicitly states that the band will not be available until after 2008. Thus the band is clearly not available throughout Europe and the text should be modified.

The first bullet in section 3.4 also states in relation to the IMT-2000 TDD bands at 2GHz (1900-1920 MHz and 2010-2025 MHz) that “The use of these TDD bands by the technologies considered in bands allocated to the broadcasting service is under technical and regulatory investigation”. BT understands that to the contrary the CEPT has recently adopted Decision (06) 01 which designates these 2GHz bands to IMT-2000/UMTS and has refused to explicitly acknowledge that other technologies can be introduced. Indeed some administrations (notably France) have indicated that only IMT-2000 technologies will be licensed in those bands. If on the other hand this technical and regulatory investigation is intended to mean in relation to the WAPECS initiative then the statement would seem appropriate and in this case it may be clearer if this reference to WAPECS is added.

Finally, BT would note that the WRC-07 agenda item 1.4 on the frequency requirements for IMT-2000 and systems beyond IMT-2000 may provide an important opportunity for Europe to introduce more international regulatory flexibility into the bands under discussion, for example possible introduction of new primary mobile service allocations and changing the IMT-2000 footnotes to be more technology neutral. Thus the RSPG may wish to consider inclusion of some reference to the WRC-07 within the document.

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