

DigiTAG views on the Radio Spectrum Policy Group questions on the spectrum implications of switchover to digital broadcasting

(1) How can co-ordination between Member States on spectrum management, at bilateral and EU level, contribute to a quick and efficient switchover?

For operators as well as industry, big markets are essential for success in achieving speedy and efficient switchover. Spectrum management and licensing, switch-off policy, programme contents, coverage areas, roll-out legislation and regulatory frameworks have all been issues governed traditionally through national decisions. DigiTAG is of the opinion that harmonisation in these issues at EU level might bring advantages in the effort to strengthen European markets.

(2) In particular, what would be the added value from EU co-ordination ahead of the Regional Radio Conference starting in 2004 and other international negotiations?

New services are implemented differently and with different timescales in eastern and western parts of Europe as well as in the north-south direction between Europe and North-Africa. There are sometimes technical reasons for this, but more often political and economic factors are dominating ones. International harmonisation can lead to faster penetration from the market perspective and the EU has an important role to play in encouraging harmonisation within the Member States, and beyond, to serve as an example for other national administrations.

(3) Are greater transparency and technological neutrality of spectrum assignment, notably through valuation and market tools, instrumental to switchover?

To ensure a thriving market in digital products and services to the consumer, some element of consistency and stability within which the market develops will be absolutely necessary. There are already many factors of diversity in the approaches being taken to rolling out digital services, and five years after the switch-over process began in lead countries, there are many others which have yet to start. During this time, the value of spectrum for 3G telecom services has been tested in the market, but this method of assigning licenses has yet to be proven to have been any more instrumental in ensuring sustainable service deployment than other regulatory methods of spectrum licensing.

(4) What will be the “spectrum dividend” from switch-off, and how should this be allocated to specific services?

Digital modulation systems offer significant efficiency gains in the spectrum frequency bandwidth required to broadcast programmes. Typical examples we find in Europe at present offer four or five standard definition programmes in the frequency channel normally occupied by one analogue service. Simultaneously, audiences are showing increasing interest in greater choice of programme services. Therefore, for

DigiTAG Project Office

c/o EBU, Ancienne Route 17 – CH 1218 Grand Saconnex/Geneva

Tel: +41.22.717.2735 Fax: +41.22.717.2462

E-mail: projectoffice@digitag.org <http://www.digitag.org>

terrestrial broadcasting to offer a competitive programme choice and higher quality, with a similar population coverage as today, a similar amount of spectrum will be needed. In addition, when we take into account the features which will distinguish the future appeal of digital terrestrial broadcasting, including in particular services to portable, mobile and handheld receivers, the replanning necessary to optimise these unique applications after analogue switch-off is unlikely to yield a significant release of spectrum anywhere in mainland Europe. In this context, DigiTAG thinks that the management of any such 'dividend' for such future Broadcasting services will be possible within the planning rules proposed by the CEPT to the ITU Regional Radio Conference, in particular the *Mask* and *Allotment* concepts.

(5) Does convergence require more flexible allocation mechanisms than traditional ones, which tightly link frequency bands and individual communication services according to ex ante decisions?

The use of digital technologies in broadcasting, telecommunications and IT, already offers considerable synergies within the services offered. Modern systems typically apply mixtures of physical and protocol layers in the construction of services and applications, and this provides significant flexibility to permit appropriate and rapid response to the development of markets. In contrast, it is likely that 'flexibility' in frequency band allocation mechanisms will always imply longer response times.

DigiTAG Project Office
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