

### Consultation on the spectrum implications of switchover to digital broadcasting

Radio Spectrum Policy Group  
European Commission  
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Date	11 <sup>th</sup> March 2004

### Siemens response to the RSPG consultation on the spectrum implications of switchover to digital broadcasting

Dear Madams and Sirs,

Siemens congratulates RSPG for its interesting consultation initiative in advance to the Radio Regional Radio Conference (RRC-04), starting in May this year. We welcome the opportunity to comment at an early stage in the EU process which is an important step for further international negotiations taking into account the increasing convergence.

We are happy to provide an overview of the Siemens Information and Communication Mobile's opinions on the 'digital dividend' and the evolution of spectrum management in response to the RSPG questions.

Please find our comments and responses in the attachment.

We hope that you will find our contributions useful and wish you furthermore a successful consultation and insightful results.

Yours sincerely

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### Attachment

#### **Siemens Response to the RSPG Consultation on the spectrum implications of switchover to digital broadcasting**

Question 1:

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

At a time when radio systems should satisfy very different market requirements, access has to be flexible. There is a clear need for increased bandwidth whereby national borders should not form barriers. Therefore the co-ordination between Member States – bilaterally as well as on EU-level – on future spectrum management is crucial.

In fact, a co-ordinated approach on EU level is essential to fully benefit from European wide harmonisation in terms of a smooth introduction of new, European-wide services. Other benefits would result out of avoiding co-ordination in border areas and an improved global competitiveness for the whole European market.

Question 2:

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

An EU co-ordination ahead of the Radio Regional Conference (RRC-04/05) and other international negotiations would clearly mean added value for European businesses.

For instance, the EU could discuss and elaborate a way to ensure that the RRC-04/05 is sufficiently forward looking when establishing the New Digital Plan. The impact of the switchover process as well as the exact value of the digital dividend for Europe can be identified following the requirements stated in Article 9.2 of the Framework Directive: “Member States shall promote the harmonisation of use of radio frequencies across the Community, consistent with the need to ensure effective and efficient use thereof and in accordance with the Decision No. 676/2002/EC (Radio Spectrum Decision)”.

Siemens strongly supports frequency harmonisation based on forward looking transparent processes.

Question 3:

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

Transparency is always a most welcome tool in a change process. In our opinion, technological neutrality of spectrum assignment cannot be equated with ignoring standards. In other words, open standards are crucial for the switchover process. This is particularly relevant in the context of convergence where services can be delivered by broadcasters, fixed and mobile operators.

Question 4:

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

Migration from analogue to digital transmission technology is enabling a more efficient use of the available radio spectrum. According to ITU-R SG1 “Digital television is approximately four times more efficient than analogue television in the broadcasting service.” With switching-off of analogue services spectrum resources are “freed” and a so called “digital dividend” is obtained.

In the context of convergence, we recommend to think about identification of this spectrum for interactive services like interactive broadcast for stationary and mobile use and other individual bidirectional media communications, where spectrum will be used in two directions such as mobile telephony including high bandwidth B3G-air interfaces, wireless LANs etc. All these services are targeting the same market and may use different technologies as they could be DAB/DVB-Handheld technologies or 3G technologies and others beyond. Such "digital dividend" could be justified by market demand in order to allow both, interactive as well as original one way broadcast services for the provision of pluralism and cultural diversity in the European Member States.

Question 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?**

Convergence and rapid technological evolution require the possibility to use the spectrum in a more flexible way. Thus, "technology neutral" allocation mechanisms seem to replace traditional ones. Nevertheless special attention must be drawn to the implementation process when adopting such mechanisms. The positive effects of global or at least European harmonisation should not be hampered. Therefore the obligatory use of open standards would help the industry to concentrate on development of advanced customer services.

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