

**Consultation on switchover to digital broadcasting**  
**Response from Finnish Communications Regulatory Authority and Ministry**  
**of Transport and Communications**

**(Q1)** How can co-ordination between Member States on spectrum management, at bilateral and EU level, contribute to a quick and efficient switchover?

**A1:** The initialisation of the switchover process should be done on the political level. The key issue on the spectrum management side is the length of the transition period. The coordinated approach on the EU level would be essential for the success of introduction of digital broadcasting.

**Comment:** would be? Varmaa on, ettei koordinoitu lähestymistapa onnistu. Meidän kannaltamme siitä ei edes niin hirveästi iloa olisikaan, kun Venäjä ei ainakaan toistaiseksi ole EU:n jäsen...

**(Q2)** 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?

**A2:** The planning area covered by the Regional Radio Conference (RRC) 2004/2006 is much wider than the one covered by EU member states. CEPT has been preparing for this Conference on technical issues for two years and in the preparatory work a common view has been reached on most issues. The EU coordination is envisaged for issues of political nature. The EU should have an active role in preparation for the second session (early 2006). Especially the member states should establish a common view on the transition period from analog plan to all digital plan. Another important issue is the spectrum dividend and the harmonised EU approach to that.

**(Q3)** Are greater transparency and technological neutrality of spectrum assignment, notably through valuation and market tools, instrumental to switchover?

**A3:** Publication of national plans or even preliminary plans to all digital broadcasting would facilitate the switchover process within the member states. In preparation for the RRC process certain technical assumptions have been used for the initial assignment planning. This gives the overall framework from the technical side and no further technical neutrality is possible.

**(Q4)** What will be the "spectrum dividend" from switch-off, and how should this be allocated to specific services?

**A4:** After the transition period (analogue to all digital) certain amount of spectrum will be made available for other services. The important issue is to make this spectrum available on a harmonised manner to create mass markets for new innovations. The target should be the same portion of the spectrum to be made available throughout the member states and on the larger scale within the CEPT. Another target should be also the same time scale. The spectrum below 1 GHz

is technically and based on propagation characteristics most suitable for mobile service and it should be considered in the first place as prime candidate in the reallocation process.

**(Q5)** Does convergence require more flexible allocation mechanisms than traditional ones, which tightly link frequency bands and individual communication services according to ex ante decisions?

**A5:** Already in the CEPT preparatory work for the RRC process certain degree of convergence can be noted (e.g. DVB-H and mobile reception to be taken into account). However, in general the planning of broadcasting allotments does not provide much flexibility to cover requirements of e.g. other services in the long term. This confirms the importance of the spectrum dividend.