

SFR Answer to RSPG consultation on the spectrum implications of switchover to digital broadcasting

Considering the following assumptions :

- The spectrum efficiency of terrestrial digital TV is about six times the efficiency of present terrestrial analog TV.
- As it is planned to deploy and operate simultaneously digital and analog TV up to the switchover of the analog one, it is obvious that spectrum will be available after this switch off and it is not clear that new digital TV services such as high definition TV or others new services will need to use the total "spectrum dividend".
- The "spectrum dividend" not used by the new digital TV services could be in a range of 50 to 100MHz.
- The nature of the new digital frequency plan which will be defined in the framework of Regional Radio Conference starting in 2004 could ease or impede the reuse of these frequencies by other applications.

SFR considers that it is of utmost importance that an appropriate digital frequency plan allows an easy reuse of the "spectrum dividend". Regardless of the application or technology which could be implemented in this spectrum, we would like to underline, as an example, that the amount of the addressed spectrum is similar to the total spectrum used by GSM900 in Europe.

Consequently, having in mind to allow an efficient reuse of the "spectrum dividend" by other applications and/or technologies which still have to be defined, it is desirable that EU establishes a policy on this issue in order to support international negotiations with the aim to :

- Allow the freeing of a continuous bloc (50-100MHz) of spectrum at the time of terrestrial analog TV switchover.
- Take into account decisions or projects in other Regions, for example in the United States, in order to support a global harmonisation of this bloc which has to be, at least, harmonised in Europe.
- Make this spectrum available in Europe in an harmonised timeframe.