

## Comments regarding the Consultation of a RSPG Opinion on the spectrum implications of switchover to digital broadcasting

TeliaSonera would like to make the following comments regarding the Consultation of a RSPG Opinion 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?*

**EU co-ordination may help to speed up the switchover process in some cases by showing member states a clear indication for what kind of services the remaining spectrum could be intended for. However, the co-ordination should not be allowed to delay the switchover process of any member state.**

*(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?*

**Since CEPT already has ongoing preparations for the RRC, EU could help by supporting CEPT in that work and promote the CEPT-positions. EU policies could be included in to the CEPT preparations and in that way help to co-ordinate the European preparation work. However, CEPT should still remain to be the main co-ordinator in Europe.**

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

**Transparency and technology neutrality is in general good. However it is important that the spectrum for a certain service will not become too scattered. This is especially important for mobile services where the mobile terminals must be able to travel worldwide.**

**"Technology neutrality" should not mean that all services are given the same amount of spectrum without considering spectrum efficiency and network capacity and also available alternative solutions for implementing each service.**

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

**It should be possible to allocate a large part of the spectrum for public telecom purposes. It is important that spectrum is allocated to the market in the same way as spectrum for other public telecom services. The spectrum should also be available to all operators in the telecom market. If a certain part of the spectrum is reserved to broadcasting only and assigned according to**

**broadcasting regulation (as opposed to telecom regulation) that part should not be able to use for telecom purposes.**

*(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?*

**Since different technologies are converging, more flexible allocations are needed in the future. If the same technology could be used for different purposes, that will be more efficient for both operators and customers. However, it still should be needed to gather common types of technology in the same or adjacent frequency bands to avoid interference problems and fragmentation. From a competition point of view it is important to find a way to make such spectrum available to all players at the market in an equal way.**