

**Conseil Supérieur de l'Audiovisuel
of French speaking Community of Belgium's Response
to the public consultation
on the draft RSPG Opinion on the Digital Dividend**

Digital dividend due to analogue TV switch-off is important and could be used for various applications. The European Commission envisions the use of this dividend as a means to improve broadcast medias, to develop converging media services (i.e. DVB-H) or to introduce new generation mobile services (3G or 4G).

However, this flexibility in technologies, as promoted by the Commission, is likely to be implemented at the cost of various limitations and constraints, such as:

- smaller reception zones;
- growing difficulties in applying the concept of spectral mask¹;
- higher risk of interferences...

During the Regional Radiocommunication Conference (RRC-06) in Geneva, the French speaking Community was allotted various channels in the IV/V band, among which four important channels located in the sub-band 790 to 862 MHz (channels 61 to 69).

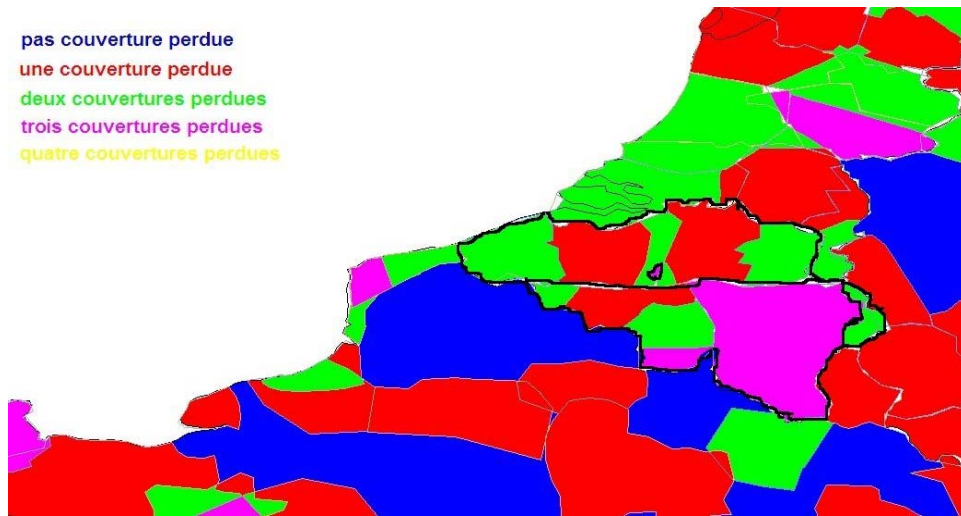
In Belgium, the use of these channels by alternative technologies could not start before June 2015 and only if this part of the spectrum is not reserved for digital broadcast media.

Concerning the share of the IV/V band between broadcast services and mobile services, some questions need to be raised, among which issues of networks compatibility and the feasibility of a harmonised sub-band.

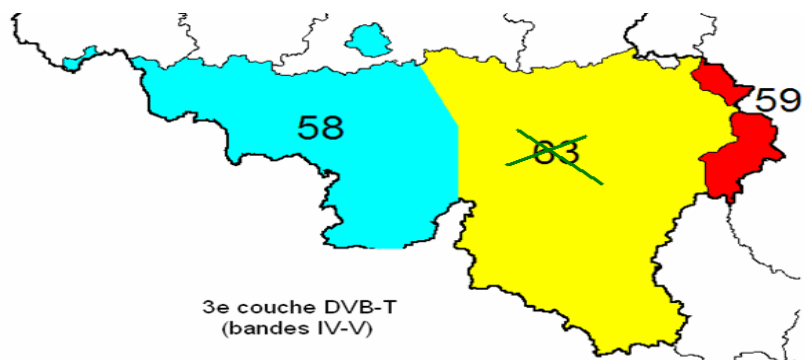
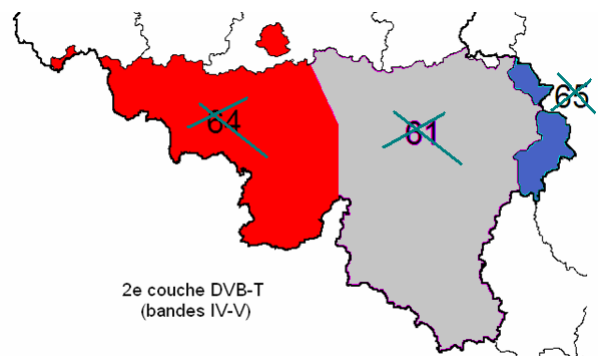
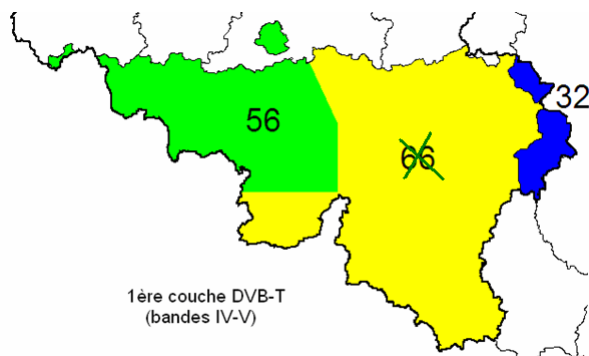
Studies and research are still ongoing but we already know that the consequences for digital television in the French speaking Community will be important. The ability to host different services on the same frequency sub-band seems increasingly unlikely. Moreover, four channels allocated to the French speaking Community are located in the upper part of the IV-V band (channels 61 to 69) with important implications.

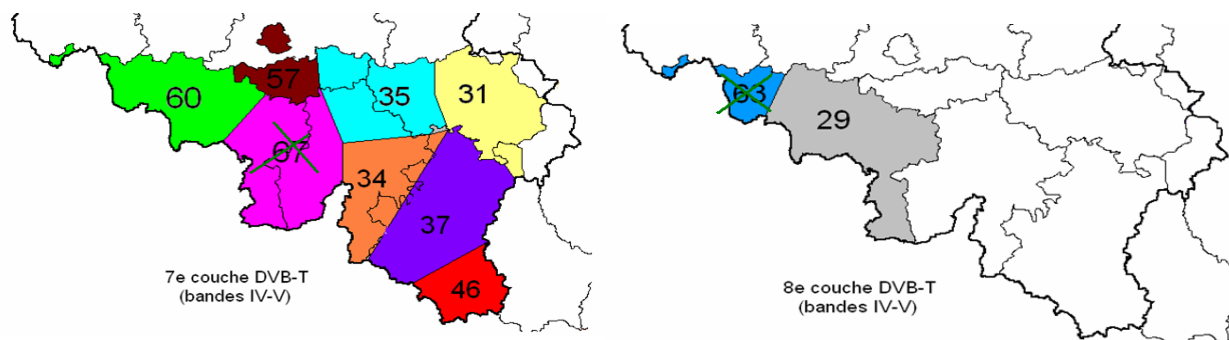
The map below shows the number of missing coverages if channels 61 to 69 are indeed dedicated to bi-directional mobile services.

¹ Spectral mask defines the level of acceptable interferences inside specific geographical and frequencies limits.



The French speaking Community would lose half of its layers (layers originally forecasted for broadcast media) when other countries would have 7 to 8 layers:





Belgium expressed its opinion in a report to CEPT² by publishing the following note:

"The choice of any sub-band will create different important holes in the layers obtained at RRC 06 and the current GE06 plan will not remain intact.

In addition the harmonization of a sub-band will lead to a non-equitable access of remaining GE-06 channels between countries and even within a given country such as Belgium.

Belgium has a very high density of plan entries in the upper part of the band. With the choice this part of the band, Belgium will lose up to four layers in some parts of the country depending of the size of the sub-band.

Bilateral or multilateral discussions will not be sufficient to ensure equitable access to spectrum with our neighbouring countries. Consequently significant re-planning of the GE06 plan will be necessary and this is not an acceptable option for the Communities in Belgium."

In conclusion, according to the principle of equality of treatment, the French Community has to recover as many layers as any other member state. So, if on average, member states –while giving the sub-band to mobile services- lose 1,5 layers initially foreseen for broadcast media, it is not acceptable that the French Community would lose more.

Brussels, June 30th, 2009

² CEPT Report 22, Report B from CEPT to the European Commission in response to the Mandate on: "Technical considerations regarding harmonization options for the Digital Dividend" "Technical Feasibility of Harmonizing a Sub-band of Bands IV and V for Fixed/Mobile Applications (including uplinks), minimizing the Impact on GE06"; Report approved on 6 July 2007 by the Electronic Communications Committee (ECC) within the European Conference of Postal and Telecommunications Administrations (CEPT) www.erodocdb.dk/docs/doc98/Official/word/CEPTRep022.doc