

**ANITEC response to the Public consultation
on the draft RSPG Opinion on the Digital Dividend (RSPG09-272)**

June 24, 2009

ANITEC appreciates this opportunity to comment on the RSPG opinion document on the Digital Dividend sharing the considerations elaborated with its industry members on this important issue in the last months.

It is a matter of fact that all the European stakeholders recognized that there are significant social, cultural and economic benefits to be gained from this unique opportunity of making available the digital dividend in the 800 MHz band.

ANITEC understands that the RSPG Opinion is focusing on needs to encouraging the Member States towards a cooperative spectrum management approach, in order to conciliate few different national policies on the type of services to provide, and different national timescales in the DTT transition.

We fully agree with this overall structure of the RSPG Opinion and on the need of a mitigation plan.

In addition, ANITEC wants to stress that the best solution to maximize the benefits of the digital dividend for the European society is making available the 800 MHz band for electronic communication networks (ECN) and electronic communication services (ECS) for wireless broadband applications, other than broadcast transmission networks and services.

ECN and ECS for wireless broadband applications

The ECN and ECS for wireless broadband applications are going to be an essential leverage for both the safeguard of the social, cultural and economic cohesion and the competitiveness of the EU at international level, other than be an essential element for the resumption of economic growth from the general international downturn, bridging the digital divide and general public welfare.

Timely plan and act

According to that, it is crucial to consider the time constraints: any delay in the DTT transition or in making available the digital dividend spectrum with a coordinated, or possibly harmonized, approach would impact negatively on the EU economic scenario. Than ANITEC fully agrees on RSPG recommendation 2.

Range of services

We also support RSPG's view at 4.1 "Range of services" that spans a considerable range of the ECN and ECS services, and finally takes into account also the need of a sustainable solution on the PMSE services. We strongly recommend that the range of services taken into account should explicitly include public interest uses.

As recognized in 6.2 of the RSPG Opinion on PUS Public Use of the Spectrum:

The RSPG recognises that spectrum use by the public sector to deliver specific public safety and security services is of paramount importance, where it facilitates the fulfilment of essential general interest objectives and the implementation of key national and EU policies.

From the social point of view a lot of benefits should be gained from the ECN and ECS wireless broadband technologies in the areas of Public Protection and Disaster Relief that encompass:

- Public safety: The usage of wireless technologies is essential to the day by day work of public safety agencies, widespread disaster response, and localized emergency notification and response.
- Healthcare: By transmitting health related data in real-time, wireless technologies reduce the need for travel and for direct clinical contact and the accuracy of diagnosis, contributing to keep healthcare costs under control while at the same time improving access to and quality of the care. Whereas some applications would need real time and reliable transmission of "life parameters" at low bit rate, others could benefit from larger bit rates (telemedicine/telesurgery with extensive use of imaging technologies), both being accommodated by broadband networks.
- Environment: There is great potential for wireless technologies to minimize environmental impacts and to prevent disasters with video-surveillance and monitoring systems.

Assuming the inclusion of these public interest uses in the ECN and ECS wireless broadband applications, ANITEC fully supports the RSPG recommendations 1, 3, 5, 6, 7.

Previous ANITEC initiatives on digital dividend

On February 2009 ANITEC addressed a document on the digital dividend to Italy electronic communications administration i.e. the Ministry of Economic Development – Department of Communications, and the Authority of Communication AGCOM.

The main statement of the document being:

<< Italy must have an active role on the digital dividend, as an enabler of the development of electronic communications systems towards the new generation technologies and services, in

order to safeguard the competitiveness of the country to European and international level, as essential element to the resumption of economic growth, particularly in the current scenario of economic crisis.

Based on these considerations, ANITEC suggests that Italy destinies, as soon as possible and in a coordinated way among all Member States, the band of digital dividend 790-862 MHz to mobile broadband services and to other wireless services of social relevance, in particular to the public safety services.

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ANITEC represents the ICT & Consumer Electronic companies in Italy.

ANITEC is member of ANIE Federation which represents the electrotechnical and electronics industry sector in Italy within Confindustria (Confederation of Italian Industry).