

29<sup>th</sup> June 2009

## **DIGITALEUROPE RESPONSE TO THE PUBLIC CONSULTATION ON THE DRAFT RSPG OPINION ON DIGITAL DIVIDEND**

DIGITALEUROPE welcomes this opportunity to comment on the draft RSPG opinion on digital dividend. We appreciate RSPG in its leading role with regards to the digital dividend. Through its related previous Opinions, the RSPG has provided the necessary guidance and framework to allow Europe to progress quickly on its analysis of the benefits of the digital dividend as well as the path to turn these promises into reality.

DIGITALEUROPE agrees on the unique opportunity of the Digital Dividend and the 800 MHz band in particular for Europe to benefit from the exceptional propagation characteristics of the frequency band when extending electronic communication services especially in less populated areas, where it is primarily thought to be used. We also support the view that the 800 MHz band (790-862 MHz) should be used for non-broadcasting services, in particular mobile broadband services, while the part below 790 MHz should be dedicated to allow for the development and evolution of broadcast services including HDTV and mobile TV.

In particular, DIGITALEUROPE strongly supports the opinion of the RSPG and shares the RSPG goals of:

- Intensifying the European discussion and effort towards a coordinated approach of introducing the 800 MHz band, especially through promoting the discussion between member states, thereby eliminating the uncertainty about the availability of the band in any given country.
- Member states should especially pay due attention to the processes of cross-border coordination as well as coordination of the access to spectrum based on the principle of equitable access.
- Acknowledging and adopting the working results and conclusions of the CEPT on the 800MHz band.
- Adopting the WAPECS principles for the introduction of services in the 800 MHz band, thus enabling technology and service neutrality.

While DIGITALEUROPE notes that the RSPG recommends that the EC supports Member States in renegotiating aspects of the GE06 Plan, it argues that the GE06 Plan is a sufficient framework for the implementation of the 800 MHz. Therefore, DIGITALEUROPE welcomes RSPG's opinion that the EC should support Member States in the process of bi-lateral/multi-lateral negotiations, inside the GE06 Framework, for the evolution of the plan required to introduce the 800 MHz band.

DIGITALEUROPE would like to stress the usefulness of a harmonized approach, since it is a critical pre-requisite for the creation of radio based mass market products. Bearing in mind that the relevant market size for the development of affordable mobile broadband equipment is Europe, harmonization is required to ensure that cutting edge mobile terminals and radio base station and any other mass market equipment is available in due time and at the right price. Hence, harmonization is critical to ensure that European citizen will benefit from the Digital Dividend as a whole.

While recognizing the varying national conditions, DIGITALEUROPE recommends the RSPG to identify key obstacles which could prevent the introduction of a harmonized 800 MHz band approach. If necessary, immediate actions to remove potential blocking points are encouraged.

We also recognize that interference and EMC issues with the already existing DVB-T receiver population in the market as well as with cable networks and associated equipment eventually must be addressed. This will provide clarity to the related industry in order to develop immediately cutting edge equipment for the 800 MHz band of the Digital Dividend.

Finally, DIGITALEUROPE suggests that RSPG could consider the following points in order to achieve a harmonized approach in a timely manner:

- Request/confirm Member States to complete the analogue TV switch-off by 2012.
- Request Member States to plan for the immediate release of the 800 MHz band following analogue TV switch-off.
- Encourage relevant stakeholders to investigate and develop cost effective solutions to interference and EMC issues specifically related to terrestrial receivers as well as cable networks and associated equipment already in the market.
- Request the EC to consider monetary support of Member States in the practical process of freeing the 800MHz band, e.g. by inclusion into its broadband strategy. This may include considerations on how to ensure availability of broadcast equipment designed for the new spectrum arrangement

## ABOUT DIGITALEUROPE

DIGITALEUROPE, the organisation formerly known as EICTA, is the voice of the European digital technology industry, which includes large and small companies in the Information and Communications Technology and Consumer Electronics Industry sectors. It is composed of 61 major multinational companies and 40 national associations from 28 European countries. In all, DIGITALEUROPE represents more than 10,000 companies all over Europe with more than 2 million employees and over EUR 1,000 billion in revenues.

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