



Qualcomm Europe Inc.

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Mr. Daniel Pataki
Chairman
Radio Spectrum Policy Group

Rome, 30 June 2009

Dear Mr. Pataki

Qualcomm response to the Radio Spectrum Policy Group public consultation on the Digital Dividend

Qualcomm welcomes the opportunity given by the RSPG to express its views on the draft Opinion on the Digital Dividend. Qualcomm considers that a spectrum policy which would enable sustainable innovation, investment, competition and development in the wireless market, should be based on the pan-European harmonisation of the technical conditions for spectrum use, including channeling arrangements, thus allowing efficient standards competition within a technology neutral regulatory framework.

Qualcomm believes that the 800 MHz, in addition and as a complement to the 900 MHz, will provide ideal coverage to extend broadband access for rural areas and smaller towns and communities in a cost-efficient manner, with the resulting positive impacts on productivity, employment and bridging the social divide. The release of the 800 MHz across Europe at the latest in 2012 as well as the harmonised implementation of the spectrum usage technical conditions as defined by CEPT, including the FDD channeling arrangement, are of critical importance for the timely development of mobile broadband standards and mass market products in this spectrum.

Qualcomm wishes to congratulate the RSPG for the leading role it has played since 2004 in accelerating the Analogue to Digital TV transition¹ and fostering the harmonisation and

¹ RSPG Opinion on the EU Spectrum Implications of Switchover to Digital Broadcasting. RSPG04-55, 19 November 2004

release of the Digital Dividend ² in Europe. We consider that the current RSPG Opinion on the Digital Dividend is yet another major milestone to successfully achieve a pan-European and timely release of the 800 MHz band.

Qualcomm is in general agreement with the assessment done and the recommendations put forward by the RPSG in its Opinion. However, while we note that the Opinion correctly identifies the risk of a delayed release of the 800 MHz due to the delays in DTT rollout in some Member States³ and the cost incurred in clearing the 800 MHz band from incumbent users⁴, we would see high value for the RSPG to consider in its Opinion potential solutions to mitigate this risk. A delay in the pan-European release of the 800 MHz will negatively impact the development of the broadband market and will stifle the unique opportunity that the 800 MHz band provides for Europe's economic development. Indeed, the 800 MHz band is one of the key components of the EU's objective to achieve the 100 % high-speed broadband coverage for all European citizens. Qualcomm therefore encourages the RSPG to recommend in its Opinion that the European Commission and Members States consider the use of community funds to finance the Analogue to Digital TV switchover and the 800 MHz spectrum clearance from incumbent users. Member States which would benefit from those funds would release and award in a timely manner the 800 MHz spectrum for the delivery of broadband services. The spectrum award would be based on coverage requirements, rather than sole financial considerations. This approach which fulfills a number of EU and Member States policy objectives is a real win-win opportunity for the telecom as well as the broadcast industries:

- It fosters Analogue to Digital TV transition in Europe, allowing for the Analogue TV switch off to take place in due time before 2012,
- It allows the release of the 800 MHz for broadband services across Europe before 2012,
- It allows the award of the 800 MHz spectrum in a way which achieves the European Commission and Member States objectives in terms of broadband coverage,
- It allows the use of the community funds to establish a framework which allows fair and efficient competition among operators for the build up of broadband infrastructures.

² RSPG Opinion on the EU Spectrum Policy Implications of the Digital Dividend. RSPG07-161, 14 February 2007

³ The RSPG considers that *"the general downturn in the global economy has serious implications for Member States and operators in terms of investing in the initial roll-out of DTT networks and the upgrading of existing networks. Any delay in the roll-out of DTT networks would impact on the date for analogue switch-off and the availability of the 800 MHz band"*

⁴ The RSPG notes that *"the need to clear existing and currently planned users from the 800 MHz band to make it available for ECN and ECS, other than broadcast transmission networks and services may incur costs"*



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In view of the above considerations, Qualcomm proposes to include in section 7 of the RSPG Opinion, the following recommendation:

“4 . The RSPG recommends that the EC and Member States, aiming to release the 800 MHz band for ECN and ECS, other than broadcast transmission networks and services, consider the use of community funds to finance the Analogue to Digital TV switchover and the 800 MHz spectrum clearance from incumbent users, with the objective to accelerate the release and award of the 800 MHz spectrum for broadband services”

If you require any further information regarding this response, you may contact Wassim Chourbaji, Spectrum and Technology Policy Lead for Europe and MENA (*email: wassim@qualcomm.com, phone: +33620386431*).

Sincerely yours,

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