

**TDF Group comments
to the RSPG Draft Opinion on the Digital Dividend, RSPG09-272**

TDF welcomes the opportunity to present its comments on the RSPG Draft Opinion on the Digital Dividend. TDF presented those comments at the EC hearing on Digital Dividend organised in March 2009 in Brussels.

Digital Dividend is an opportunity for both broadcast and telecoms players. Broadcasters will need additional DTT capacity for more quality – HD will become a must -, for more services (push-VoD, interactive services...), or more channels. Telecoms Operators can access to additional low frequencies to deliver high speed wireless broadband in particular for rural areas.

TDF is of the opinion that, to ensure a smooth transition and acceptance from broadcasters, EC should :

1. Secure to broadcasters long term access to spectrum they need for continuation and development

In most countries, there is a need to identify additional frequencies that can be used by broadcasters within the UHF spectrum.

For Member States deciding to reallocate the 800MHz band, there is a necessity to find replacement frequencies for existing services and/or plan entries in GE06 not yet implemented. Furthermore, in most cases, broadcasters also need additional frequencies for current and future development (additional channels, HD, new services, 3D, ...). EC should support a competitive terrestrial broadcasting platform as it is the one that allows “universal” access to TV for EU citizens.

This needs a large frequency planning optimization work both at a national and international (for coordination purpose) level.

In order to realise the Digital Dividend, coordination is necessary between countries to find alternative frequencies for allotments falling in the 790-862 MHz sub-band. EC should recognize the effort done by broadcasters to optimize spectrum usage, and facilitate different parties to work in finding acceptable replacement and development frequencies for broadcasting.

The extension of the number of broadcasting services should be studied based on the GE06 rules and the coordination process between countries that exists well before GE06. In France, the government in its report called France Numérique 2012 has fixed a target of 11+2 layers (DTT+DVB-H) in the digital Plan.

2. Guarantee to broadcasters that they will not bear any part of the burden for the migration (costs, interference, ...)

The costs to migrate broadcasting from channels 61-69 to other channels may be very high :

- Frequency planning and network modification
- Cost/inconvenience for viewers (retuning, in some cases antennas replacement or re-orientation)
- Costs due to measures necessary to solve interference problems
- Public information/assistance including potential help scheme

The migration costs may vary a lot depending on the local situations. Costs depend on the number of frequencies to be moved. In countries using heavily channels 61-69, the costs will be higher. Significant part of the cost can be mutualised with switchover operations if and only if migration is undertaken at the time of ASO.

As Ofcom states, the migration costs must not be borne by existing users, in order to ensure a cooperative project : “Funding should be made available so that the existing and planned users of this spectrum do not have to bear extra costs as a result of these changes” – Ofcom Feb 2009

Furthermore, EC should guarantee to fully protect broadcast services in all reception modes up to channel 60 at no cost for broadcast users, while looking at acceptable conditions of use for the 800 MHz.

3. Let Member States decide to implement the Digital Dividend or not depending on national specificities

A full EU harmonisation is not needed as a significant number of countries already decided to allow telecom allocation of the 800 MHz band : Denmark, Finland, France, Germany, UK, Spain, Switzerland, Sweden ...

It is not necessary to have all the EU countries adopting the sub-band. 200 M people market would be large enough to reap the harmonization benefits, even if interference issues at borders would still need to be addressed.

For some countries, the potential benefits of the sub-band may not be significant or may not compensate migration costs :

- In some countries, there may be no use for extra spectrum for wireless very high speed broadband (existing and planned spectrum, no/few coverage issues), thus very low economic value
- In some countries, there may be a very strong case for a 100%-broadcast scheme
- In some countries, the migration costs may be very high, especially where the channels 61-69 are heavily used

4. Set up an efficient framework for migration for Member States wishing to reallocate the 800 MHz band (frequency re-planning and optimization, international coordination) on a non-mandatory basis

EC should provide guidelines/recommendations to Member States willing to free the 800 MHz band asking them to

- Make a full evaluation of the migration costs and interference scenarios before deciding to implement the 800 MHz band
- Favour the migration at the same time at Analogue Switch Off
- Identify adequate funding from State or future spectrum users and do not ask current users to bear the costs
- Have bilateral discussions with neighbouring countries, under the GE06 Agreement, regarding the identification of new usable frequencies below channel 61, based on best practices and innovative spectrum planning tools (site per site coordination rather than allotments, antennas tilts, SFN, ...).
- Optimize national planning not only to compensate lost frequencies in channels 61-69 (in countries deciding to reallocate the 800 MHz band) but also to identify additional capacity for current and future development.

- Avoid a new European planning conference (regional modification of the GE06 Agreement), that would be very long to prepare and to hold, and above all not be efficient enough (not deep enough)

5. Not try to push non-pragmatic and non-market-oriented approach (multimedia cluster, different sized sub-band for telecoms)

There is no economical neither technical interest for a “multimedia” cluster. Indeed, DVB-H services are better designed to be developed within the broadcast cluster and a third cluster would introduce useless constraints to the use of spectrum, thus leading to inefficient use.

There is no sense to have a different sub-band scheme than the 800 MHz band that benefits from a de facto harmonisation in many EU countries.

About TDF Group :

The TDF Group is the main operator of shared facilities and terrestrial networks in Europe.

It assists its clients –television networks, radio stations, telecommunications operators, ISPs and local municipalities- across the entire value chain of audiovisual and telecoms networks: from upstream –with complete filming, broadcasting, content management and delivery solutions- to downstream, with transport, deployment and operation of networks, on-site hosting of operators’ equipment at its sites (10,100 in Europe) and maintenance.

TDF is a key player in telecommunications and audiovisual convergence, upstream of new technologies, and is an operator with strong local roots, close to its clients and partners, actively committed to battle against the digital divide.

TDF is present in France, Germany, Austria, Finland, Hungary, Spain, the Netherlands, Poland, Estonia and Monaco.