



RSPG – Public consultation
on the
Draft RSPG Opinion on the Digital Dividend

Submissions by PT, S. A.



Who we are

Portugal Telecom is the leading telecommunications operator and services provider in Portugal.

We operate in the areas of fixed, mobile and multimedia communications, information systems, research and development and satellite communications.

An example of leadership and innovation, Portugal Telecom is today the company in Portugal with the largest national and international presence and investment. This is a clear result of a commitment to quality and innovation which has been guided by the need to satisfy the specific needs of each of its clients in each business area and to diversify its investment strategy in different areas of the world, especially Brazil and Africa.

Quoted at the Lisbon and New York Stock Exchange, Portugal Telecom has approximately 30 thousand employees who are at the service of more than 30 million national and international customers. As a telecommunications company, its portfolio of services includes local, long distance and international telephone services, leased lines services, mobile, data and internet communications, IPTV, information systems and contents, corporate solutions and entertainment, all areas in which Portugal Telecom has positioned itself as market leader.

Portugal Telecom has also the full set of wholesale reference offers, including access to ducts (since the end of 2004).

The company has been awarded with the licence to install and operate Digital Terrestrial Television network. The DTT emissions started last 29th of April and Portugal Telecom plans to finish the national coverage by the end of 2010.

Portugal Telecom has recently announced its investment plans in fibre optical access networks with the objective of offering high speed and high quality multiple play services.



An Internationalisation Success

Present in the European, American, Asian and African continents, PT has, at international level, competence in all info-communication business areas, namely mobile, fixed, data, satellite, multimedia, e-business and directory services.

In addition to a strong presence in China, Angola, Cape Verde, Morocco and Timor, PT also stands out in the Brazilian market where, it is currently Portugal's largest investor.

Similarly to Telefónica Móviles, Portugal Telecom holds 50% share of VIVO's shares, South America's largest mobile operator and among the 40 largest mobile telecommunication companies throughout the world. Within the Brazilian Market, PT is also present in Dedic and Mobitel, companies that work in the contact centre and message transmission sectors.

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RSPG Consultation on the “Draft RSPG Opinion on the Digital Dividend”

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Introduction

Portugal Telecom (*PT*) welcomes RSPG’s public consultation and its acknowledgment of the importance of the *Digital Dividend* for the future of the Electronic Communication Networks and Services.

It is generally accepted, and mentioned in several documents and studies, that the digital dividend is a limited resource with extraordinary social and economic value and, for this reason, it is of the public interest that it should be managed and used as efficiently and effectively as possible.

PT is of the view that, at EU level, an effort must be made by all Member States in order to achieve a common and coordinated approach to the digital dividend management and usage as this is the way for reaping its full benefits. Specially, Member States must do their best effort to avoid national decisions that may negatively affect or influence the use of the digital dividend by their neighbours.

We believe in a balanced approach to the use of the digital dividend, allowing both broadcasters to upgrade and develop their offers and electronic communications operators and service providers to access and use this resource to deploy new and innovative services, bearing also in mind the need to overcome the digital divide.

PT is also of the opinion that, as long as the necessary harmonization and coordination measures are put in place at EU level, NRAs are better positioned and qualified, at national



level, to provide efficient management and use of the digital dividend. We consider that European Commission must not adopt mandatory decisions regarding to any aspect of the management and use of digital dividend.

Recently PT has presented its comments on the Digital Dividend strategy, within the scope of a consultation launched by ICP-ANACOM, where we have tackled subjects related to the management and use of digital dividend and its relation to the frequencies allocation to DTT.

The RSPG Draft Opinion

PT agrees, in general, with the Opinion of the RSPG as expressed in the consultation document (*RSPG09-272*).

However, we believe that it would be of a greater interest and value if RSPG could focus its opinion not only in the 800 MHz band but also in the entire UHF band (470-862 MHz).

Paragraph 1 of the Opinion

The text of this paragraph gives the idea that RSPG considers that 470-790 MHz band is to be allocated to broadcast networks and services on an exclusive basis. If it is so PT does not agree with RSPG recommendation, especially if broadcast does not include Mobile TV. We are also of the opinion that EC should assess not only the advantages and disadvantages of options for coordination but also allocation scenarios for the UHF band. The allocation scenarios should consider new enhanced broadcasting services, Mobile TV and a wider allocation of spectrum for electronic communication networks and services.

Paragraph 2 of the Opinion

PT fully agrees with the recommendation to EC to act as soon and quickly as possible because it is necessary to minimise regulatory uncertainty, a key aspect to promote investment and innovation.

Paragraph 3 of the Opinion

Our view is that WAPECS principles should be the prime option when making available any frequency band.

Paragraph 4 of the Opinion

We agree with RSPG to recommend that any EU harmonisation of technical elements must be based on CEPT work.



Paragraph 5 of the Opinion

We agree with the recommendation for the EC to encourage Member States to facilitate cross-border coordination agreements.

Paragraph 6 of the Opinion

We support the recommendation and consider that the EC should be referred to RSPG Opinion on “*Spectrum Concerning Outer EU Borders*” (RSPG08-232 Final).

Paragraph 7 of the Opinion

PT supports this RSPG recommendation.

Paragraph 8 of the Opinion

PT supports this RSPG recommendation. Members States should be referred to RSPG Opinion on “*Spectrum Concerning Outer EU Borders*” (RSPG08-232 Final).