

Dear RSPG Chairman,

A. We have thoroughly gone through the draft document “RSPG Opinion on Strategic Challenges facing Europe in addressing the Growing Spectrum Demand for Wireless Broadband” and has been identified that the Republic of Cyprus will be negatively affected in case some of the recommendations as recognised in the document will be implemented concerning in particular the proposal to reallocate the 700 MHz band for applications other than DVB-T.

B First of all we would to clarify that we agree with the substance of the Opinion as it is stated in page 22 “.....that more needs to be done to ensure the roll-out and take-up of broadband for all, at increasing data rates, through both fixed and wireless technologies.”

C Cyprus also fully agrees with the Opinion’s notes that:

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- (d) the frequency band 694-790 MHz represents 30% of the total remaining UHF TV spectrum. The impact of a reallocation of this spectrum for broadband will potentially be significantly more important for terrestrial broadcasting in some countries than in the case of the 800 MHz band;
- (f) the reallocation of the 700 MHz band to mobile service would require in many countries the implementation of new technologies (e.g. DVB-T2/HEVC). Therefore, any EU-policy decision regarding the use of the 700 MHz band by wireless broadband has to be accompanied by a recognition that certain Member States may need to take measures to transition DTT receivers to more efficient technologies;
- (g) there are merits in developing a common EU strategy on the whole UHF band 470-790 MHz, taking into account internal market and cross-border issues. However, this strategy has to reflect the variety of situations in Member States concerning the digital terrestrial platform and developments in terms of converged use of the spectrum;”

because it reflects Cyprus situation and difficulties to reallocate it’s DVB-T transmissions below 694 MHz band.

D Cyprus has auctioned in 2010 part of the spectrum 470-790 MHz for DVB-T applications. The frequencies auctioned are that that were allocated to Cyprus under the ITU Geneva -06 Plan and consists of 7 national layers with the following channels: 33,49,50,54,56,59,69. These frequencies were auctioned in 2010 to a private consortium to establish a DVB-T network except channel 33 which was licensed to the public broadcaster network. Channel 69 was not licensed in view of the fact that it is part of the 800 MHz band dividend for the 4th generation cellular and mobile broadband applications.

E As it is easily understood in case that a proposal or a mandatory policy is taken forward to migrate any DVB-T service below the 700 MHz it will be catastrophic for Cyprus since all private TV stations are utilising frequencies between 694-790MHz. Furthermore we would like to indicate the

following reasons in addition about the difficulties we face on a possible migration below the 700 MHz band:

- i. Cyprus is surrounded by 9 countries which 8 out of them are not Member States within the European Union. Coordination with a number of these countries is either technically difficult or literally impossible due to political constraints. In some of these countries political instability exists or used to for a while (Syria, Egypt, Libya) or others (Turkey) avoid for political reasons to enter into any coordination discussions with Cyprus. Even if the South-East Mediterranean region was under a stable political situation a technical coordination procedure with 9 countries to migrate 5 national layers to a different band still would be very complicated or impossible. It is recognised that coordination problems may exist within the EU countries but it is documented that all problems are faced in a cooperative and friendly acceptable manner which unfortunately does not apply as well for our case.
- ii. Cyprus is 100% dependent for free to air digital TV transmissions by two DVB-T networks. Only a 27% of the population is receiving TV programmes from cable and DSL infrastructure under subscription in conjunction with other services such as internet provision.
- iii. If a decision to migrate from the 700 MHz band is obligatory it means that our private DVB-T network operator will not be able to operate and a multimillion investment will have to shut down because no viable alternative solutions exists. As a result the 73% of the general population will not have any access to private channel programmes transmitted from the single private DVB-T network operator.
- iv. Even if technology is progressing and the implementation of DVB-T2 networks is a viable option, is not wise yet to move immediately to a new technology because prices are still high and not mature enough. Furthermore, due to the fact that we have very recently switched from analogue TV to DVB-T (MPEG4), it will not be acceptable by the general audience and network operators for additional financial burden if we decide to switch to a DVB-T2 solution in case of a migration from the 700 MHz band.
- v. Furthermore the current trend is that Standard Definition (SD) TV programmes are converted to High Definition (HD) requiring more and more spectrum. Therefore it is obvious that existing allocation of national layers might not be enough to cover our future needs.
- vi. The license to the private DVB-T network operator expires in 2025 and was awarded following an auction procedure and a respectful amount of fees was paid to the Government of Cyprus. It is easily understood that in case the awarded spectrum (fully coordinated under the RRC-06 procedures) is withdrawn from the licensee and to be refarmed to a different band (possibly uncoordinated) , Cyprus will might have to pay for severe penalties as compensations (capital expenditure, return fees, legal compensations etc).

F Cyprus fully agrees with the Opinion's recommendations 2(i), 3 and 4(b) and the fact that the future use of 700 MHz band should take into consideration the individual needs of each member state and the usage of the specific band. On the contrary we disagree with the Opinion's recommendation 4 (c). The recommended policy by the Opinion should be explicitly based on the needs of each Member State and sufficiently flexible so that could accommodate the countries that need to move forward to a migration from 700MHz band but at the same time to allow countries that need to carry on with the existing RRC-06 arrangements utilising the 700 MHz band for terrestrial digital TV applications.

G We would also to add our disagreement with the suggestion to implement wireless broadband services in bands “1350 – 1375, 1375 – 1400, 1427 – 1452 and 1492 – 1518 MHz” because it will create severe problems to existing users. These bands are heavily used for robust point to point communication link applications and migration to a different band seems to be unfeasible since it could not offer the same characteristics.

Finally we would like once more to draw your attention to the fact, for reasons explained in paragraph E above, that Member States should have the flexibility not to follow any obligatory harmonised policies on the utilisation of the 700MHz band. On the other hand Member states should have the right of derogation from such policies that jeopardise the existence of universal free to air terrestrial digital TV provision.

Best Regards

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