



Cable Europe

Cable Europe comments on the Draft RSPG Opinion on Wireless Broadband

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Introduction

The European cable TV industry currently provides broadband, telephony and digital TV services to approximately 76 million customers. Cable Europe represents Europe's leading cable TV operators and their national trade associations. The aim of Cable Europe is to promote and represent the industry's public policy positions and business interests at both European and international level, and to foster co-operation among its members.

Cable Europe welcomes the opportunity to comment on the Draft RSPG Opinion on the Strategic Challenges facing Europe in addressing the Growing Spectrum Demand for Wireless Broadband.

Missing Coexistence Requirement: Opportunity for Future-proofing Europe

As duly noted by the RSPG, "one of the key challenge highlighted by the Digital Agenda is 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". As result, it remains extremely surprising that coexistence between fixed and wireless services is not assessed carefully before new radio services are introduced ensuring that the contribution of these new radio services to the Digital Agenda does not impact the ability to contribute of other key services such as fixed networks.

European cable operators are one of the many important contributors to the Digital Agenda. In addition to an increasing mobile offer from a number of European cable operators, Internet, TV and telephony services are delivered to end users across a Hybrid Fiber Coax (HFC) network. HFC networks are optimized for a transmission technology based on the usage of radio frequencies (RF). In order to respond to the growing demand for data and integrated services, more and more of the frequencies available across the fixed infrastructure are being used to increase the data rate. Therefore, it has become paramount to ensure the coexistence of RF technologies used by fixed and wireless services.

Cable Europe raised this issue when the technical conditions for LTE services in the 800 MHz band where being established. However, while related decisions where based on its recommendations, CEPT limits its own scope generally to the analysis of coexistence among radio services. As a result, the issue of coexistence with fixed networks such as cable was not taken into account and left to be dealt with as a matter of Electromagnetic Compatibility (EMC). This approach bears the risk of affecting services delivered by fixed networks due to a fast changing and not well-managed electromagnetic operational environment.



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There is clearly a “disconnect” that needs to be remedied as we move towards a more connected – and complicated – future. The recognition that new services may affect existing services, regardless of whether they are radio, fixed or otherwise, is a step in the right direction to future-proofing Europe’s steady march to an increasingly connected society.

Cable Europe considers that frequent and subsequent changes to Harmonized Standards established by ETSI and CENELEC are not the appropriate response to ensure the proper coexistence of fixed and wireless services. Significant investments have been made by businesses and consumers alike that deserve to be taken into account in the economical impact assessment for the introduction of new radio services as well as when defining technical conditions.

It could well be established that specific roll-out strategies making use of smaller cells or higher frequencies in highly densely populated areas could help ensure a smooth coexistence between fixed and wireless services. However, without taking this co-existence into account in its compatibility study, the EU risks missing out on the opportunity to reassure consumers and businesses that deployed equipment will not be made redundant when the new services will be deployed. Cable Europe believes that the roll-out of new services should be something to look forward to rather than fear but without ensuring co-existence this becomes more difficult.

Recommendations

In many places throughout the document, the RSPG mentions how fixed and wireless services “complement” each other. Cable operators subscribe to this view as our industry is increasingly providing services across both fixed and wireless networks (WiFi or mobile). Therefore **Cable Europe recommends that the concept of “coexistence” between fixed and wireless services be included in the document.**

In particular, the **RSPG should consider including an analysis of the coexistence between fixed and wireless services as part of the Strategic Plan** that needs to be established by the European Commission.

Cable Europe also supports the definition of the term “wireless broadband” used by the RSPG in this draft. According to the RSPG, wireless broadband “can be described as high-speed wireless transmission of data and may be provided via fixed, mobile or satellite platforms”. Such a definition includes WiFi networks – a key offering of the cable industry to millions of European citizens.

Cable operators are increasingly deploying WiFi services as Hotspots or in consumers’ homes. As mentioned by the RSPG, we see the increasing importance this has for end-users as well as the opportunities and challenges it brings. The RSPG recommends that the aforementioned Strategic Plan should also include an analysis of the need for licence-exempt spectrum for wireless broadband. **Cable Europe strongly supports this recommendation.**



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In its recommendation 4.d, the RSPG mentions “a review of ETSI and CENELEC standards applicable to DVB-C”. As highlighted previously, Cable Europe believes that subsequent changes to these standards are not necessarily the most appropriate response to ensure the coexistence between fixed and mobile services. The review of these standards should not be a short term objective since they were already reviewed for the introduction of LTE in the 800MHz band resulting in significant changes in product requirements that need to take effect in the market. Instead, the **RSPG should recommend that new services take into account existing standards which are applicable to already deployed equipment when defining technical conditions for the introduction of new radio services** (e.g. LTE in the 700MHz band).

The necessity to review EMC standards should always be carefully assessed as this implies additional cost for equipment and always create delicate issues with devices already deployed by consumers and businesses. Therefore, it should only be considered when all other efficient mitigation measures have been explored as regulators define the technical conditions for a new radio service.

Finally the RSPG further recommends that - in developing this strategic policy for the future use of the UHF Band - the European Commission should, in the short-term, develop a clear policy to facilitate any migration which may ease making available the 700 MHz band to wireless broadband while allowing Member States to take measures relating to TV receivers in order to mandate more efficient technologies (e.g., DVB-T2, HEVC).

Cable Europe is in favor of a technology-neutral approach by the European Commission and believes that technology choices are best left to the market.

We believe that there are opportunities to fine-tune the current approach to wireless broadband to ensure that the European rollout maximizes advantages, places a premium on inclusiveness and makes every reasonable effort to limit interference. Cable Europe believes that the promotion of co-existence where spectrum is concerned is an important pillar in future-minded technological development for Europe.