



## **Draft RSPG Opinion on Strategic Challenges facing Europe in addressing the Growing Spectrum Demand for Wireless Broadband**

### **British Sky Broadcasting Limited ('Sky') Comment**

- Sky welcomes the opportunity to comment on the RSPG's draft opinion on Wireless Broadband.
- The RSPG is correct to identify that a strategic plan should be developed to meet the future demand for wireless broadband services by 2020. This is crucial to accommodate rapid growth in the provision, and use by consumers, of mobile broadband services.
- However, it is important to note that much of the predicted increase in demand is forecast to be served by offloading mobile data onto Wi-Fi networks. The European Commission has noted that European Wi-Fi networks already carry up to 20 times more internet data traffic than all cellular networks combined, and that Wi-Fi traffic growth is around 4-6 times that of cellular data growth, with 4 out of 5 new wireless technologies using unlicensed spectrum<sup>1</sup>.
- Congestion and interference are already adversely affecting Wi-Fi performance<sup>2</sup>. Together with recent and forecasted increases in data traffic, it is clear that a capacity crunch is looming. Consequently, Sky believes that an increase in unlicensed spectrum is a topic which needs more urgent attention and targeted action if economic growth is not to be curtailed by cost and availability of mobile data bandwidth.
- Sky and others in the UK have undertaken trials which demonstrate that dynamic use of UHF spectrum (in TV 'white spaces') using geo-location database technology can fulfil a variety of innovative uses and support economic growth. These uses include enhanced Wi-Fi in home and for hot-spots, machine to machine communications and rural broadband.
- Sky recommends that RSPG revises and re-issues its opinion to include, as central to its recommendations, the possible benefits of this technology and the potential use of UHF as a solution to the shortage of un-licensed spectrum. Sky also considers that reserving some spectrum in the sub 1 GHz band exclusively for this technology and its applications would be of enormous benefit to the take-up of the technology.

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<sup>1</sup> Presentation by Pearse O'Donohue, Head of Radio Spectrum Policy Unit, DG Infosoc, April 2012. Available at: [http://www.cambridgewireless.co.uk/Presentation/CWS-EC\\_Pearse%20O'Donohue.pdf](http://www.cambridgewireless.co.uk/Presentation/CWS-EC_Pearse%20O'Donohue.pdf).

<sup>2</sup> See <http://stakeholders.ofcom.org.uk/binaries/research/technology-research/wfiutilisation.pdf>