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Response to RSPG Opinion on Strategic Challenges facing Europe in addressing the Growing Spectrum Demand for Wireless Broadband

Unfortunately the term Wireless Broadband, has become synonymous with the mobile service (IMT) and ignores both the lack of spectrum efficiency in current networks and the large part the SRD bands play both in providing cost effective access to citizens and for offloading traffic from the mobile networks.

With the re allocation of the 790-862MHz band the prime reason given was to provide high speed “rural broadband”, to date the limited provision does not appear to be “high speed” and is expensive to users in comparison with other media and has proved to impact both broadcast reception and secondary services plus the (currently) thriving SRD industry and its users in the adjacent band.

In fact this mobile allocation has reduced the opportunities for many citizens of real (>100Mb) high speed broadband by limiting the spectrum available to Cable Networks, further allocations in the 470-862MHz band would impact even further this excellent spectrum efficient system *and* the new broadband delivery by White Space Devices, killing this exciting fledgling before it has a chance to evolve.

Wireless Broadband needs to be placed in an overall context of provision of broadband via all platforms to the citizen and industry in an affordable, reliable and sustainable form.

Current spectrum investigations have focused on and prioritised “mobile broadband” to the exclusion of incumbent services and an even bigger issue is that having been removed from spectrum by its allocation to the mobile service other usable spectrum for these services is being prioritised for yet more mobile use.

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A second major impact is that mobile services cannot share with other users as happened with broadcast and other sub 3GHz primary users in the past and results in total sterilisation of those bands for secondary services. From current investigations the mobile service also requires additional guard bands outside their allocation to protect the mobile system whilst the out of band energy from the mobile system sterilises even more spectrum in adjacent bands. *Efficient use of spectrum?*

Importance of secondary services to the citizen, European economy and culture and to the provision of “content” for the broadband and multimedia industry needs urgent review, rather than more block allocations to mobile removing these services to the detriment of the European PMSE industry and its ability to generate world beating content and economic benefit.

Major events both sporting and cultural have relied on (borrowed) spectrum from other users by the Administration concerned to provide the infostructure for PMSE equipment (audio and video) plus event specific requirements such as timing and team communications. In future major events may not be able to be staged (from Olympics, Formula 1 to Eurovision Song Contest) in Europe if a balanced approach to spectrum allocation is not urgently taken.

In answer to the consultation, no further spectrum should be allocated to the mobile service without:

- 1. Examining methods of making all Mobile use in its current allocations more spectrum efficient.**
- 2. Considering the benefit to wireless broadband capacity of combining the emerging 790-862MHz systems with the proposed 694-790MHz band. A single system would reduce the spectrum required to carry the same traffic level.**
- 3. Full understanding of its impact on the European economy and culture, which would result in a more balanced approach to spectrum allocation**
- 4. Minimising the cost to the citizen and industry of the removal of current facilities**
- 5. Provision of sufficient spectrum for displaced services**

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