

Intellect's comments on the RSPG draft opinion #5
"The introduction of Multimedia Services in particular in the
frequency bands allocated to the broadcasting services"

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To: The RSPG/Radio Spectrum Policy Group
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About Intellect

Intellect is the UK trade association for the IT, telecoms and electronics industries including the fixed, mobile and satellite telecommunications industries. Its members account for over 80 per cent of these markets and include blue-chip multinationals as well as early stage technology companies. These industries together generate around 10 per cent of UK GDP and 15 per cent of UK trade. For more information about Intellect go to:
<http://www.intellectuk.org>.

Introduction

Intellect welcomes the opportunity to provide comments to the RSPG's draft opinion on "The introduction of Multimedia Services in particular in the frequency bands allocated to the broadcasting services".

Overall Comments

In preparing this document the following references have been used:

[The RSPG Opinion # 5](#)
Framework Directive (Recital 6)
COM(2005)204
COM(2005)461
RSPG05-102
The New Agreement to be reached in RRC06 (termed GE-06)
Broadcast Agreements in Stockholm, Chester and Maastricht.

Intellect's comments have been constructed on the basis of the assumption of high data rate service delivery as a base-line, then all discussion is focussed on the selected bands. The bands chosen for

the main discussion are: Band III, UHF, L-Band with minor discussion of the UMTS TDD bands and the additional IMT2000 bands.

Intellect's detailed comments.

There are some implied priorities we see in the document which are well worth further exploration. Primarily, there is a possible implication (in section 3.2) that the RSPG considers the priorities for the service delivery to be (in order):

1. More TV Programmes
2. HDTV
3. Portable receivers
4. Mobile receivers

Intellect would be interested to know if this was the RSPG's intention. In particular, mobile TV trials have shown a high degree of consumer interest & evidence of willingness to pay for such services.

Naturally, comments on technical issues surrounding the use of uplinks etc are stressed. Intellect also notes that overall, much of the necessary spectrum is stated to be unavailable for such uses until after 2012 (several places in text). Intellect would be interested to know if any attempt has been made to see if new services can be introduced before 2012.

There is a potential confusion over the terms used in the document. It mentions "new services", multimedia services and mobile multimedia services. There are some places where it is not clear what service is being referred to. So, whilst efforts are clearly prioritised to support the introduction of HDTV, this itself could be on multimedia platforms and hence fall into several categories of proposals. Intellect assumes that the references to Multimedia Services throughout the document are intended to represent broadband wireless services, and particularly mobile multimedia services.

There is a reference that the "supply of high quality multimedia services could bring benefit on a pan-European basis". This is potentially problematic as the benefit is clearly seen on a pan European basis, but the document later makes it clear that the likely usage by non-traditional broadcast services may not be harmonised on a pan-European basis. This could carry the implication of an a priori need to convince some authorities of the benefits of some types of service. Intellect is keen to encourage the greatest possible clarity in this matter, to avoid any possible contradictions.

Band III

We support the proposal to keep flexibility and respond to TV and sound broadcasting, and particularly the possibility for a 7MHz channel to be used either as a 7MHz video channel or 4 digital sound layers.

Bands IV/V

Intellect notes that flexibility in these bands is based on fixed reception and that static assumptions have been used to develop shared spectrum re-use models. As a result there appears to be no EU-wide harmonisation except in terms of an 8MHz channel arrangement. In addition, the provision of service to roaming receivers remains a question at both national and international level.

The uncertain availability until beyond 2012 is a serious concern for Intellect. We do not believe this will bar mobile TV services before this date.

L Band

The need for a review of the Maastricht Agreement is confirmed and Intellect supports this and is interested in the timescales. We also note that perhaps a significant (but apparently unstated) additional flexibility that might be sought is the ability of the spectrum users to concatenate a number of 1.75MHz channels (three say) to form bigger channels. Can the RSPG please comment on this.

Other relevant bands

In references to other bands the opinion states the bands identified for IMT-2000 at 2 GHz and 2.5 GHz are available for that purpose throughout Europe. Intellect believes only 7 EU Member states and Switzerland have implemented or are committed to implement the CEPT Decision of March 2005 designating the 2.5GHz band to IMT-2000/UMTS. Moreover, in at least one country the band will not be available until after 2008. The text is therefore misleading.

There is also a paragraph which states that use of these TDD bands by the technologies considered in bands allocated to the broadcasting service is under technical and regulatory investigation.. Reference to WRC-07 agenda item 1.4 on the frequency requirements for IMT-2000 and systems beyond IMT-2000 may be useful and provide an important opportunity for Europe to introduce more international regulatory flexibility into the bands under discussion. CEPT has recently adopted Decision (06) 01 which designates these 2GHz bands to IMT-2000/UMTS only, so Intellect cannot see how other technologies can be introduced.

Conclusions

Intellect is generally supportive of the RSPG opinion and is pleased that there is some substantive input on the subject. We have given some comments above to identify better how we have interpreted what is in the opinion and have detailed how that impacts on the markets for our members. Overall we feel that effective light touch regulation is key to the success of multimedia services in these frequency bands.

Finally Intellect would like to draw to the attention of RSPG the fact that there is a great deal of consumer value to be gained from the provision of these services. The judicious use of wireless delivery and mobility is a driver for uptake.

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