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To: INFSO B1EXT
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Dear Sirs,

ESOA would like to highlight that even though satellites address white spots for *traditional broadband* connectivity immediately, satellite systems are inherently capable of providing Next Generation Access (NGA) broadband *services* across Europe and in particular to NGA 'White Areas'. Due regard should be given to the fact that the recent, spectacular technology leap in performance offered by satellite broadband services provided through existing or already procured satellite systems is evidence of the capability of satellite operators to invest in adapting to always-evolving requirements. By the end of 2010, satellite broadband performance will be able to provide three to five times what it can provide today. Therefore a further such technology leap should not be precluded. The following points are particularly relevant:

- (i) The subscription offers available once satellite broadband has been made accessible do in fact not only enable basic connectivity but also support more bandwidth intensive applications as may be required by businesses and local governments;
- (ii) A speedy roll out of connectivity via satellite will not only enable this first level of *broadband* connectivity but also will support the ever more bandwidth intensive applications foreseen for NGA's. Most bandwidth hungry applications under NGA are likely to be IPTV/ iplayer/ other video based applications, which are well suited for delivery via satellite broadcast or multi-cast: satellites are ideally suited for streaming video. Thus not only are the initial public objectives of connecting the un-served (as laid out in the EERP but also stated by Member States) met, but also the threat of a potential Digital Chasm (where some have "basic" connectivity and others have "ultimate" broadband connectivity so that the Divide in fact remains or gets worse) is alleviated.
- (iii) We also submit that speed of data should not be the only factor taken into consideration by the Commission when considering if viable alternatives exist on the market. The Commission should consider the marginal benefits of additional data speed against the significant costs required to install NGAs.
- (iv) Satellite operators and their commercial partners may in future wish to seek from EU Governments or regional governments, support for NGA capable satellite systems including the space-segment, given that such NGA capable satellite systems can provide an efficient solution for addressing the aggregation of NGA White Spots across any given (large) EU country or set of EU countries. In this regard, the EC should ensure that any recommendations or guidelines do not de-jure or de-facto preclude the scope for such NGA capable broadband satellite systems to contribute to the solution or even be recipients of public funding.
- (v) Finally for information, we would like to refer the Commission to the recent opinion of the International Telecommunications Union from April 2009, entitled "Opinion 2 on the Implications of the Advent of Next-Generation Networks (NGNs) and Advanced Broadband Access" which was adopted at the fourth World Telecommunication Policy Forum (Lisbon, 2009). This document referred to the role of all technological platforms and noted specifically "That terrestrial and satellite-based broadband wireless

technologies could offer leapfrog solutions to expand access significantly in many remote and rural areas, with a unique role for satellite in expanding service delivery and coverage areas”.

The effects of the unique feature of satellite - total coverage - was clearly recognized and accepted by the ITU. The ITU then went further in noting: “That broadband access is available through different wireline and wireless technologies and will be provided by different methods in different countries, including an integral role for satellite technologies in extending the deployment of NGNs, particularly in remote and rural areas”

After noting this, the ITU called upon Member States to consider, inter alia, the following measures:

- (i) Develop an appropriate regulatory regime that encourages infrastructure-based and service-based competition for broadband access, while also taking into account the special characteristics of satellite technologies;
- (ii) Encourage and facilitate the use of multiple approaches for NGN deployment, including use of satellite networks.

Best regards

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