

ANITEC
response to the
DIGITAL DIVIDEND PUBLIC CONSULTATION

“Transforming the digital dividend opportunity into social benefits and economic growth in Europe”

July 30st, 2009

ANITEC appreciates this opportunity to comment on Digital Dividend sharing the considerations elaborated within its members on this important issue in the last months.

It is a matter of fact that all the European stakeholders recognized that there are significant social, cultural and economic benefits to be gained from this unique opportunity to enable the availability of the digital dividend in the 800 MHz band.

ANITEC understands that the Commission is focusing on the need to encourage Member States towards a cooperative spectrum management approach in order to conciliate a few different national policies on the type of services to provide and the different national timescales in the DTT transition.

We fully agree with this overall structure and with the need of a mitigation plan.

In addition, ANITEC wants to stress that the best solution to maximize the benefits of the digital dividend for the European society is to enable the 800 MHz band for electronic communication networks (ECN) and electronic communication services (ECS) for wireless broadband applications.

The ECN and ECS for wireless broadband applications, as a matter of fact, will be an essential leverage for both the safeguard of the social, cultural and economic cohesion and the EU competitiveness at an international level; moreover these applications will be an essential element for the resumption of economic growth from the general international downturn, bridging the digital divide and general public welfare.

According to the above considerations, it is crucial to consider the time constraints too: any delay in DTT transition or in providing the digital dividend spectrum with a coordinated, or possibly harmonized, approach would have a negative impact on the EU economic scenario.

With reference to Chapter 4 - Proposed Elements for Roadmap- Anitec would like to point out the following considerations:

4.1a *“Ensuring the availability of a compression standard on all DTT receivers sold after 1 January 2012 that is at least as efficient as the H264/MPEG-4 AVC standard”*

It should be borne in mind that the official Italian plan is to complete the analogue-to-digital transition within December 31st, 2012 .

Now and during the whole transition process, in order to smoothen the plan, our Italian Government provides each customer with a contribution for a single purchase of DTT decoder and/or TV set with embedded decoder.

The decoders which the Italian law refers to, are said to be “at least Mpeg-2 compliant”; this looks to be incompatible with the above mentioned Commission suggestion, this is the reason why we suggest to change the date into “.....sold after 1 January 2013”.

Moreover, we strongly suggest to consider the idea that this requirement should be re-examined at the end of the switch-over process and should be basically market driven depending on whether or not a large scale of HD contents will be available (which will drive to the Mpeg-4 decoder need);

Our believe is that this is a very pragmatical approach which should not be considered as a “chicken and egg” issue which, on the contrary, the terminal Vs availability of network infrastructure is.

4.7 Addressing future challenges

Anitec fully shares the Commission view regarding the evolving nature of the digital issue and the need that the roadmap should evolve in parallel with market demand and social requirements.

Bearing this in mind, we strongly recommend that the range of services taken into account should explicitly include public interest uses according to the RSPG Opinion:

“The RSPG recognises that spectrum use by the public sector to deliver specific public safety and security services is of paramount importance, where it facilitates the fulfilment of essential general interest objectives and the implementation of key national and EU policies”.

From the social point of view a lot of benefits will be gained from the ECN and ECS wireless broadband technologies in the areas of Public Protection and Disaster Relief that encompass:

- Public safety: The usage of wireless technologies is essential to the day by day work of public safety agencies, widespread disaster response, and localized emergency notification and response.
- Healthcare: By transmitting health related data in real-time, wireless technologies reduce the need for travel and for direct clinical contact and the accuracy of diagnosis, contributing to keep healthcare costs under control and at the same time improving access

and quality of the healthcare. Whereas some applications would need real time and reliable transmission of “life parameters” at low bit rate, other applications could benefit from larger bit rates (telemedicine/telesurgery with extensive use of imaging technologies), both being enabled by broadband networks.

- Environment: There is great potential for wireless technologies to minimize environmental impacts and to prevent disasters with video-surveillance and monitoring systems.

Previous ANITEC initiatives on digital dividend

On February 2009, ANITEC addressed a document on the digital dividend issue to Italy electronic communications administration i.e. the Ministry of Economic Development – Department of Communications, and the Authority of Communication AGCOM.

The main statement of the document is:

<< Italy must have an active role on the digital dividend, as an enabler of the development of electronic communications systems towards the new generation technologies and services, in order to safeguard the competitiveness of the country to European and international level, as essential element to the resumption of economic growth, particularly in the current scenario of economic crisis.

Based on these considerations, ANITEC suggests that Italy assigns, as soon as possible and in a coordinated way among all Member States, the band of digital dividend 790-862 MHz to mobile broadband services and to other wireless services of social relevance, in particular to the public safety services.

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ANITEC- Associazione nazionale industrie Informatica, Telecomunicazioni ed Elettronica di Consumo represents the ICT & Consumer Electronic industry in Italy.

ANITEC is member of ANIE Federation which represents the Electrotechnical and Electronics industry sector in Italy within Confindustria (Confederation of Italian Industry).