

Joint Position of the Ministry of Industry and Trade and the Czech Telecommunication Office concerning the Public Consultations of the European Commission „Transforming the digital dividend opportunity into social benefits and economic growth in Europe“

The Ministry of Industry and Trade and the Czech Telecommunication Office (hereinafter „MIT/CTO“) welcome the opportunity to express their views in the public consultation concerning the background document of the European Commission (EC) „Transforming the digital dividend opportunity into social benefits and economic growth in Europe“. In the framework of public consultations and follow-up workshops held in autumn 2008 and in spring 2009. CTO consulted the issues of the future use of the digital dividend with the public and reached the conclusion that the implementation of new mobile electronic communications networks and services and the development of digital TV transmission enjoyed a support. In the framework of the national public consultation concerning the above mentioned document of the European Commission MIT received 2 contributions from entrepreneurs in the area of electronic communications. These contributions expressed support concerning the situation assessment made by EC and its proposals stated in the consultation document.

MIT/CTO agree that the digital dividend represents a unique opportunity for meeting the growing demand for the radio spectrum, namely for new wireless services such as high-speed mobile internet.

MIT/CTO agree at the same time that the coordinated approach in the framework of frequencies acquired from the digital dividend in 790-862 MHz band across EU may increase the benefit for the European economy as well as bring the positive social impact for users.

MIT/CTO understand „multi-annual radio spectrum policy programmes“ approved by the European Parliament and the Council as an idea of new political institute of the revised regulation framework for electronic communications networks and services (Article 8a par. 3 of the Revised Framework Directive) and as an instrument that will help to increase the security of long-term investment in the area of electronic communications under the condition of having a high level of impartiality and a capability to react flexibly on the development of technology and society needs.

Concerning selected elements of the EU plan/ initiative (EU roadmap) MIT/CTO states:

- a) MIT/CTO agree with the EC objective to meet consumers' expectations by providing high quality standards for the reception of the terrestrial digital television broadcasting. However taking into account that according to the current transition plan, the principal part of the transition in the Czech Republic will be completed by 11 November 2011, we believe that the declared support of the consequential implementation of more efficient methods of television broadcasting from the point of view of the spectrum, such as the utilisation of standards equivalent to H264/MPEG-4 and DVB-T2, respectively, after 1 January 2012, should be complemented by European Commission rules concerning the possibilities of the state subvention utilisation in this process (for example for the renovation of set-top-boxes with the support of these standards).

- b) MIT/CTO identify from public consultations in the Czech Republic also the need to undertake a number of specific activities in order to ensure an adequate resistance of TV receivers against interference.
- c) MIT/CTO support an efficient cross-border coordination with other countries with the objective to achieve Community intentions in ensuring member states necessities both as regards mobile communications area and television broadcasting. In the case of the Czech Republic it does not concern the coordination with countries that are not members of the Community.
- d) MIT/CTO share the opinion that the question of the utilisation of white spots and the radio spectrum generally is the issue of continuously monitoring all newly emerging technologies and creating conditions for their efficient use.

MIT/CTO position towards urgent measures proposals

- a) MIT/CTO agree that the transition to the digital television broadcasting and the switching off the terrestrial analogue television should be accelerated nevertheless this speeding-up must result from real conditions of the countries including their international commitments. The revision of national transition plans from the analogue to the digital broadcasting means the execution of complex interlinked measures that include a number of organizational, technical and economic conditions, where consensus of state administration authorities, business entities and general public must be reached. They share the opinion that it is purposeful to undertake available measures, in order to make the proportion of analogue television broadcasting marginal by 1 January 2012 and this way to prevent the domino effect when the implementation of mobile communication services would negatively influence in chain reaction especially analogue broadcasting still operated in some country or countries.
- b) MIT/CTO support the opening of 800 MHz band for electronic communications services pursuant to the proposed adoption of harmonized technical conditions in Europe. As a basis they consider technological solutions elaborated by CEPT in virtue of the EC mandate. At the same time they point out that adopted measures must not impede the member states to finish the transition. In the case of the Czech Republic where due to lack of available frequencies the method of partial transitions region-by-region was used, and for example it is indispensable to use frequencies from 800 MHz band for the TV broadcasting temporarily.
- c) MIT/CTO thank EC for the possibility to consult this proposal and they will continue their cooperation with EC in order to achieve the common goal set out in this consultation paper.

Simultaneously they inform that releasing of 790-862 MHz band for mobile communications services got the support in the above mentioned public consultations and the consultation process with stakeholders in order to accelerate the switchover has already been started. They have the intention to coordinate this process thanks to the establishment of a „think-tank“ and as a follow-up to adopted EC measures they want to organize another round of public consultations at the turn of the year 2009/2010.