

Estonia - Ministry of Economic Affairs and Communications

Estonia welcomes the opportunity to comment on the public consultation document on the Commission's proposals towards an EU approach to the digital dividend and would like to provide the following comments.

Summary of Estonian position

We support technical and service neutral approach in spectrum usage. But the market players have to decide whether broadcasting or electronic communications services are needed. We can not agree on any binding way forward to introduce mobile broadband until there are restrictions on usage to protect Russian aeronautical radionavigation services. Such binding way will result in huge waste of spectrum in Estonia. If there will be a spectrum decision on this issue, it must take into account possible different usage in border areas with long or conditional transition period to ensure efficient use of spectrum.

In near future we can't see any bilateral solution under ITU regulations for EU bordering countries.

More detailed position

4.1. Improving consumers' experience by ensuring high quality standards for terrestrial digital television receivers in Europe

We support and favour implementation of new technologies. For example there are 3 nationwide multiplexes in use and we have seen successful tests of HDTV. There are also DVB-H test channels in Tallinn. In general DVB-H is seen as one digital dividend technology for transmission of mobile television. Some countries even have allocated special frequencies only for DVB-H. But for mobile television we don't support state-controlled intervention that part of the digital dividend has to be allocated to DVB-H technology. There are more transmission technologies for mobile television. Appropriate need must turn out from technology and service neutral public auction or beauty contest. Also we can inform you that in Estonia MPEG-4 AVC is the obligatory video compression standard for DTT operator.

4.2. Increasing the size of the digital dividend through further spectrum efficiency gains

Using spectrum efficiently is a key challenge for the future. While introducing DVB-T2 network standard we must keep in mind that it requires investments into network and also new receivers so the regulation must be flexible. Digital dividend in the band 174-230 MHz is a good opportunity and test field for DVB-T2 and SFN networks for alternative operators or services.

4.3. Making the 800 MHz band available for low/medium power electronic communications networks, under harmonised technical conditions, following the principle of technology and service neutrality.

Harmonization is essential for industry (manufacturers, operators) and it gives the confidence and certainty to make the necessary investment. At the moment 800 MHz band is already harmonised under Geneva 2006 Agreement. What we are talking in the point 4.3 is changing of the harmonised DTT usage to the usage of harmonised low/medium power electronic communications networks. In our understanding harmonised usage of spectrum means binding spectrum decision and obligatory technical parameters. We can't talk about pan-European harmonisation while some Member States are allowed to continue with high power broadcasting or permanently deviate from the future possible spectrum decision.

Estonia is in the position that technology and service neutral market based approach is relevant here as well. We let the market decide whether the 800 MHz band is needed for DTT services following the Geneva 2006 Agreement or electronic communications services (mobile broadband) with heavy

restrictions to protect Russian aeronautical radionavigation with the possibility that the compatibility studies under ITU are fruitful and next WRC11 brings relief.

Taking into account described restrictions from Russian Federation and band-plan proposed by CEPT for mobile services there is possible to use TDD in the western half of Estonia and FDD only on islands. In frequency domain we can use 2x12 MHz in FDD (no complete 5 MHz channel) and 20 MHz in TDD (following the CEPT band-plan, 4 complete side by side 5 MHz channels). This doesn't include impact of DTT from Latvia and Russia.

Under current circumstances the introduction of new electronic communications services in the 800 MHz band would be a remarkable waste of spectrum for Estonia. It may be feasible in long term if the frequency usage will be harmonised also with Russian Federation.

4.4. Adopting a common position on the potential use of the "white spaces" as part of a possible extension of the digital dividend

We support the idea of using "white spaces" as a possible extension of the digital dividend as a secondary usage on a non interfering and non protected basis for example for cognitive radio or SAB/SAP applications.

4.5. Ensuring the continuity and further development of wireless microphone applications and other secondary uses of the UHF spectrum

In Estonia UHF spectrum is heavily used for PMSE services. Therefore we endorse finding spectrum harmonisation measures inside the scope of digital dividend.

4.6. More effective cross-border coordination with non-EU countries

Unfortunately in recent years there has not been any success in bilateral cross-border coordination negotiations with Russian Federation. Following is a list of our proposals for negotiations concerning DVB-T spectrum usage with no positive reaction from Russian Federation.

30.10.2006 NO S.8-8/06/4128

09.03.2007 NO S.8-2/07/818-1

11.04.2007 NO S.8-3/07/1175-2

24.09.2008 NO 5.1-34/08-2104-002

29.07.2009 NO 6.15-5/09-1984-001