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European Commission
DG Information Society and Media

PTS (Swedish Post and Telecom Agency) response to the Commission Consultation document “Transforming the Digital Dividend opportunity into social benefits and economic growth in Europe”

The following is the response of PTS as Sweden’s spectrum management authority.

Background

The Swedish government decided in November 2007 to clear the frequency band 790–862 MHz (the ‘800 MHz band’) of terrestrial broadcasting and to allow the use of the band for electronic communications services other than broadcasting. PTS has initiated a project to assign licenses in the band.

PTS views on the consultation

PTS strongly supports the Commission initiatives on the Digital Dividend. PTS has also actively contributed to the work of the RSPG on this issue over the previous years.

To a large extent, PTS supports the proposed roadmap as presented in the consultation document. PTS sets out its viewpoints and comments on certain proposals below, under their respective headings in the consultation document.

PTS observes that at least some of the issues addressed in the consultation document are not specific to the Digital Dividend, but are general issues of spectrum management. This point is elaborated on below.

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

PTS does not believe that there is a need for EU action to mandate certain compression standards in DTT receivers placed on the EU market. There is already a clear market movement to include MPEG-4 compression in new receiver equipment. Consequently, it is doubtful whether there really is a “chicken-and-egg problem” concerning future switchover to more efficient compression standards on the DTT platform. PTS therefore sees little evidence of market failure requiring regulatory action.

More fundamentally, PTS believes that mandating certain compression standards in DTT receivers may “lock in” networks and viewers in one technology, and pose an obstacle to future developments. EU action may create the impression that further development of the DTT platform is “the only way forward”, and is questionable with regard to principles of technology neutrality. There is rather a need for a more open and fundamental long-term review of the future of the frequency bands now used for terrestrial broadcasting (see below section 4.7).

4.1 b) Setting standards for the ability of digital TV receivers to resist interference

PTS strongly supports this proposal, but wishes to point out that minimum requirements for receiving equipment are a general spectrum management issue which preferably should be addressed as generically as possible. The issue is currently being discussed in CEPT and ETSI.

On the subject of digital terrestrial TV receivers, it is important to keep in mind that the upper band limit of broadcasting reception in bands IV/V will not necessarily be fixed at 790 MHz for the indefinite future.

4.2 a) Promoting collaboration between Member States to share future broadcasting network deployment plans (e.g. migration to MPEG-4 or DVB-T2)

PTS does not object to this proposal. However, as indicated above (section 4.1 a), discussions of switchover to new broadcasting technology should not obscure more fundamental questions of the future of the broadcasting bands.

4.2 b) Encouraging the deployment of Single Frequency Networks (SFNs)

Studies available to PTS indicate that a migration to DVB-T SFNs on a national level would not result in significant gains in spectrum efficiency. A large scale

multi-national SFN migration might conceivably create net gains in spectrum efficiency. However, the costs of such a migration would be considerable.

4.2 c) Supporting research into "frequency agile" mobile communications systems

PTS supports this proposal. However, the issue is not specific to the Digital Dividend and there is no need to artificially couple research on “frequency agile technologies” with issues of broadcasting. This research should focus generally on future technology for Dynamic Spectrum Access and “cognitive” systems.

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.

PTS supports EU harmonization of the technical elements of use of the 800 MHz band for electronic communications networks and services, in accordance with the process laid down for technical implementing measures under the Radio Spectrum Decision.

PTS expresses no opinion on the issue of a final date for mandatory implementation of the 800 MHz band in the whole EU. However, PTS strongly believes that any such proposals must not be allowed to jeopardize the progress already made.

While PTS is certainly in favour of more EU countries joining the footnote 5.316 of ITU-RR, it should be noted that Member States that wish to join this footnote need consent from neighbouring countries, some of which may not be members of the EU.

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

PTS supports this proposal. The issue of access to “white space” spectrum is studied in CEPT and ETSI, just as is the case for other new technologies.

PTS also notes that the issue of “white space” equipment is studied by the RSPG Working Group on Cognitive Technologies.

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

PTS supports this proposal. There is already considerable work in progress on this issue in CEPT and ETSI.

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

PTS supports this proposal. It is in the field of international coordination and negotiations with non-EU countries that concerted EU action can bring the most immediate benefits to ensure the availability and success of the 800 MHz band across the whole EU. Consequently, the Commission should treat this as a priority issue.

4.7 *Addressing future challenges*

PTS wishes to make the following observations on the future challenges concerning spectrum in the current broadcasting bands.

In the early discussions on the spectrum aspects of the switchover to digital terrestrial broadcasting, the focus was on the immediate release of a certain quantity of spectrum for other uses than broadcasting. The term Digital Dividend in itself connotes a ‘one-off’ static gain of spectrum.

Today, the move towards flexibility in spectrum management, as embodied in the WAPECS principles, raises more fundamental questions of the future of the terrestrial broadcasting frequency bands. These bands are unique and extremely valuable, due to their propagation characteristics, and there is *a priori* no reason, from a spectrum management perspective, to assign the major part of them exclusively to terrestrial broadcasting without any investigation if alternative uses would result in more efficient use of the spectrum.

Consequently, PTS urges the Commission to adopt a clearer high-level and long-term roadmap, which should include an explicit commitment to a more fundamental review of the spectrum that is currently used for broadcasting. This review may focus on the following questions:

- The future availability of more spectrum (below 790 MHz) for electronic communications networks and services.¹
- The added value for society as a whole of a more flexible and efficient use of the spectrum currently used for broadcasting.
- The long-term future of traditional terrestrial broadcasting as a viable platform for TV distribution, given the fact that the spectrum resources

¹ The RSPG Opinion on WAPECS (RSPG05-102) identifies the whole band IV/V (470–862 MHz) as a candidate for full technology and service neutrality in accordance with WAPECS principles.

available for satellite broadcasting and the capacity in cable networks appear to offer substantially more room for development of enhanced broadcasting services for consumers, than is the case for terrestrial broadcasting.

- The convergence of traditional broadcasting service and other electronic communications services, offering the possibility to enhance spectrum efficiency by offering evolved broadcasting services over wireless broadband electronic communication networks.

PTS is aware that these questions, and others related to broadcasting, are likely to be politically controversial. Nevertheless, the earlier the point in time at which they are first raised, the more prospects there are for future progress. In particular, the substantial time frames inherent in ITU negotiations necessitate a long-term approach.

PTS finally notes that the potential need for further spectrum for PPDR services can be adequately satisfied on a national level and that EU action consequently is not necessary.

5.1 Accelerating analogue switch-off by 2012

PTS has no objections to this proposal.

5.2 Taking steps towards the opening of the 800 MHz band for electronic communications services by adopting harmonised technical conditions of use in Europe

The views of PTS have been expressed above in section 4.3.

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