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European Commission  
Directorate General Information Society and Media

Ref Public consultation on "Transforming the digital dividend opportunity into social benefits and economic growth in Europe"

Title **Contribution by the Finnish Ministry of Transport and Communications**

The Finnish Ministry of Transport and Communications thanks for the opportunity to contribute to the public consultation launched by the European Commission.

The Ministry agrees with the European Commission on the unique potential that the digital dividend can provide to the European economy and society. The consultation document constitutes a balanced approach with several concrete action lines. At short and medium-term the policy should focus on making the 800 MHz band available for mobile broadband services as quickly and extensively as possible. This can be complemented by other actions aiming at possible further exploitation of the digital dividend in the longer term.

Concerning the proposed actions the Finnish Ministry has the following comments:

#### **Proposed urgent actions**

The Finnish Ministry supports the Commission's request to accelerate analogue switch-off in those Member States, which have not yet completed the digital switch-over.

The Finnish Ministry also supports opening of the 790-862 band for electronic communication throughout the EU. To this end the technical harmonisation of the frequency band at EU level is highly desirable given that the final position on the issue can be taken only when the Commission will have submitted its draft decision to the Radio Spectrum Committee.

#### **Proposed elements for a roadmap**

The Finnish Ministry welcomes an EU roadmap which could increase coordination between the Member States and the European Commission while leaving flexibility to cope with national specificities. The Finnish Ministry supports the proposed elements and their swift implementation.

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As regards the individual elements which have are currently under consideration by the European Commission, the Finnish Ministry has the following comments:

*High quality standards for terrestrial digital television receivers*

The Finnish Ministry supports ensuring the availability of DTT receivers with H264/MPEG-4 AVC compatibility after 2012.

The Ministry can also support setting standards for the ability of digital TV receivers to resist interference.

*Increasing the size of the digital dividend through further spectrum efficiency gains*

The Finnish Ministry supports sharing information on network deployments plans (e.g. migration to new standards). Taking into account the national specificities, e.g. the fact that Member States are at very different stages in their digitisation processes, decisions on migration to new transmission and/or compression standards should be made at national level also in the future.

The Ministry can also support in principle encouraging the deployment of Single Frequency Networks but as above emphasises that decision-making should remain at national level taking account the costs and benefits at national level.

The Ministry can also support research into “frequency agile” mobile communications systems.

*The 800 MHz band*

The Finnish Ministry supports making the 790-862 MHz band available for low/medium power electronic communications networks under harmonised technical conditions as soon as possible. The proposal corresponds with the decision made by the Finnish Government in June 2008.

The Finnish Ministry is willing to consider also a final date for the implementation of the decision. However, it should be taken into account that the implementation in practice may be prevented in several member states (including Finland) by the fact that the 800 band is currently used by other radio services in third countries and this use is protected by the existing international agreements.

*White Spaces*

The Finnish Ministry supports examining the grounds for opening up the “white spaces” and considering a coordinated approach to their regulatory treatment. The Ministry is in favour of speedy progress with this action line.

*Wireless microphones and other secondary use*

The Finnish Ministry considers that ensuring the continuity of current secondary uses, wireless microphones in particular, is a significant political issue which cannot be solved at the level of an individual Member State. The Ministry supports examining the issue and developing a “migration path” at EU level.

*Cross-border coordination with non-EU countries*

The Finnish Ministry appreciates the Commission's offer to assist Member States in their negotiations with non-EU countries. The EU could intensify its coordination also in the international radio spectrum conferences. Improved coordination and possible assistance by the European Commission will not eliminate the need of negotiations with third countries also at bilateral and regional level.

*Future challenges*

The Finnish Ministry agrees on the need to review the roadmap every 2-3 years.



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