

Subject: Response to **Digital Dividend Public Consultation**

Source: Department of Communications, Ministry of Transport, Republic of Latvia.
Electronic Communications Office (Frequency management body).

Contact person: Mr. Inars Jekabsons

Title: Senior Expert

Organization: Electronic Communications Office, Republic of Latvia

Address: 41/43, Elizabetes Str., Riga, LV-1010, Latvia

Phone: +371 29153 684; + 371 67333 034

Fax: + 371 67821 275

e-mail: inars.jekabsons@esd.lv

The present response to the Public consultation document on the digital dividend “Transforming the digital dividend opportunity into social benefits and economic growth in Europe” represents common opinion of the Department of Communications of the Ministry of Transport of the Republic of Latvia and the Electronic Communications Office on the basic proposals towards an EU roadmap and urgent actions highlighted in the document by setting the proposals in boxes.

In this response the boxes are commented in order they appear in the Consultation document.

Proposal in Box 1 (Endorsement of the roadmap by the European Parliament and Council, section 3.).

We believe inclusion of the *most strategic elements of the future EU roadmap concerning the digital dividend* in a multi-annual radio spectrum policy programme and *achieving endorsement by the European Parliament and the Council* may contribute to coordinated exploitation of the dividend in the EU.

Formulating this strategy it is important to prevent appearing inappropriate mandatory decisions at EU level which do not take due account of differences in national circumstances of Member States.

Proposal in Box 2 (Ensuring high quality standards for DTT receivers, § 4.1.).

Implementation of European measures setting realistic higher requirements and standards for the receiving equipment for digital television can be supported consistently. Such action is considered being an important way for higher efficiency of spectrum use and quality of reception.

Proposal in Box 3 (Increasing size of digital dividend through further spectrum efficiency gains, § 4.2.).

At the ITU Regional radiocommunication conference RRC06 important decisions were agreed and applied in the planning process harmonising the use of the transmission system DVB-T in more than 100 countries and planning in a great majority of countries for single frequency networks (SFN) which represent a means for effective use of spectrum. For Latvia the SFN approach was used for all networks in the plan.

Nevertheless, technologies of the signal compression methods and the radio transmission systems are still developing and getting more effective.

Orienting Member States to follow the technological progress and implement the most advanced systems and planning approaches is useful with the objective reaching more effective use of spectrum.

Close coordination of innovative actions between countries concerned and mutual exchange of experience would be the appropriate way towards spectrum efficiency.

Nevertheless, establishing mandatory requirements in regard to the implementation of new systems and defining fixed terms thereto can not be considered as appropriate measures.

Taking into account that implementation levels of the DTT are essentially different in Member States, as well as the actual market situation and other national circumstances Member States should be able to take such decisions on a non-mandatory bases provided previous successful coordination with the countries concerned was performed.

Proposal in Box 4 (Making the 800 MHz band available for electronic communications networks, § 4.3.).

At the WRC07 the 800 MHz (790-862 MHz) broadcasting UHF sub band was co-allocated to the mobile service effective from 17.06.2015. WRC07 “harmonized” in fact the sub band as a dedicated part of the digital dividend intended for a non-mandatory use by ITU member states for the mobile service (IMT).

Some countries have decided to use the sub band for the mobile service while others haven’t taken decision regarding possible future changes in its use.

Latvia up to now has not taken decision about how would be use of the sub band after the analogue switch-off.

Delay of such decision is caused by different factors, such as Latvia being in early stage of implementation of DTT, the need to use the sub band for television during the transition period, the impact to implementation of the digital television caused by delayed (2015) switch-off of analogue TV in the bordering non-EU countries, different use of the dividend spectrum in these countries and unformed market situation in addition.

To provide conditions for effective implementation of the needed number of DTT networks, taking into account all local circumstances, the Cabinet of Ministers of the Republic of Latvia has already granted rights of use of the UHF band in full (470-862 MHz), in accordance with the Regional agreement Geneva, 2006, to the organization - implementing DTT, the rights being in force until 2014.

Consequently, the 800 MHz sub band will be used for television during the transition period.

We believe the non-mandatory approach provides opportunity for Member States to use the sub band efficiently at the same time complying with the local circumstances. We consider the RSPG opinion for non-mandatory approach is the right way forward for Member States and we do not agree with mandatory measures.

Proposal in Box 5 (Adopting common position on the use of “white spaces”, § 4.4.)

At this stage no EU-level measures stimulating the use of “white spaces” seem to be necessary.

Accepting of common technical characteristics for developing frequency agile cognitive devices could be beneficial for use of such devices in Member States when they become available.

Proposal in Box 6 (Ensuring the continuity for radio microphones, § 4.5.)

It is important to allow wireless microphones and other SAB/SAP devices to continue operation in broadcasting bands.

No EU-level action would be necessary.

Proposal in Box 7 (More effective cross-border coordination, § 4.6.).

Bilateral and multilateral cross-border negotiations and coordination have been used constantly as an important means for reaching efficient use of spectrum and taking into account at the same time interests of all parties involved.

Latvia is bordering both with EU and non-EU countries and has got a long experience of successful coordination with non-EU countries.

Assistance of EC in such negotiations might be helpful in particular cases involving wider regions and groups of countries.

Proposal in Box 8 (Addressing future challenges, § 4.7.).

We believe establishing by Commission a mechanism to monitor external developments affecting the roadmap with an objective to define changing spectrum needs and to make spectrum available on a coordinated basis would be appropriate.

Proposal in Box 9 (Accelerating analogue switch-off, § 5.1.).

The analogue switch-off date defined for Latvia is in conformity with the proposed new EU target date – 1 January 2012. Regulations of the Cabinet of Ministers of the Republic of Latvia define 1 December 2011 as the switch-off term. The granted spectrum use rights include requirements for coverage to be reached in 2010 – the target coverage was defined as 99 % of the territory. To meet so high requirements channels throughout all UHF band must be used for television during the transition period.

In the bordering non-EU countries 17 June 2015 was taken as the switch-over date. Respecting the need to protect the analogue TV stations operating in these countries along the common border the transition period for Latvia will be partly extended and the digital dividend will be freed fully for new uses only after that date.

Proposal in Box 10 (EC Decision on the 800 MHz sub band, § 5.2.).

The technical harmonisation of the sub band 790-862 MHz by a decision developed and adopted by the Commission might be useful provided it contains agreed common technical sharing criteria between digital television and advanced mobile systems – both potential future users of the sub band. The included technical criteria should comply with the respective criteria actually in elaboration by ITU and CEPT.

The agreed technical criteria would provide for technical support in cross-border coordination activities.

At the same time there can not be agreement with inclusion in the decision such mandatory requirements and approaches which can impede Member States to use the sub band in a way corresponding their interests, current market demands and complying with local circumstances.

The said is particularly of high importance for Member States bordering with non-EU countries.