



**WIND Hellas comments to EC Consultation Document:  
Transforming the digital dividend opportunity into social benefits and  
economic growth in Europe**

The spectrum frequencies made available by the switch from analogue to digital broadcasting can provide a great opportunity to enhance innovation and growth thanks to more efficient use of spectrum.

In this challenge, mobile operators have a major role to play in being able to provide upgraded and/or new services, relying on broadband.

The case of Greece, where WIND Hellas operates, is exemplary in so far as broadband penetration is amongst the lowest in Europe (13.4% - EC 14<sup>th</sup> Implementation Report) and where the DSL gap rural/national coverage in percentage points is the 3<sup>rd</sup> highest throughout Europe (36.3%- EC 14<sup>th</sup> Implementation Report – IDATE source). The picture is worsened by the long lasting issue of the problematic mobile mast licensing.

These national specificities thus create a condition whereby any delay in adopting the necessary measures for completion of the transition to full digital technology could seriously jeopardize the opportunities to increase broadband provision and usage. In addition, it would constrain operators to provide coverage to rural areas and island communities using higher (more expensive) frequency bands<sup>1</sup>.

WIND Hellas is thus in full support of calling for a quick analogue switch –off, being this an essential pre-condition for the launch of mobile broadband services.

For the UHF band as a whole we presume that the conditions will be ensured so that a fair allocation of spectrum for mobile broadband use between the mobile and broadcasting industries occurs.

As far as the specific 800 MHz band is concerned, WIND Hellas is in support of reserving the 790-862 MHz sub band on a technology and service neutral basis to electronic communications networks and to ensure the implementation of forthcoming harmonized technical conditions.

The core principles that should be followed for this allocation should include:

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<sup>1</sup> Mobile Broadband for the masses: regulatory levers to make it happen, McKinsey&Company, February 2009, “ Low-band spectrum can drastically reduce the capital expenditures operators have to make for base stations, especially in rural areas, due to the greater coverage that lower spectrum provides.”

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- service and technology neutrality
- standards harmonization based on the results of CEPT work
- Member States coordination both within the EU and with non-EU neighboring countries

Most important of all is the principle of a technology neutral allocation of spectrum, allowing for more flexible use. This orientation is necessary for regulating the converging electronic communications and media/content industries, allowing for:

- Spectrum allocation attached more effectively to societal and economic needs
- Flexibility that allows for the emergence of novel services
- Focus on electronic communication services, functioning as a neutral conduit of information and content and therefore as a proven and effective vehicle for societal and economic progress.

At the same time this principle should be balanced against interference issues and the benefits of economies of scale. In this respect it is thus important to encourage as many countries as possible to follow the EU orientation. The need to protect broadcast services in neighboring countries can jeopardize the deployment of mobile broadband services in the UHF band throughout the EU.

To conclude, WIND Hellas believes that an effective means to minimize market uncertainty is through a coordinated and mandatory EU regulatory approach regarding the digital dividend in order to “duplicate” the success story of the GSM system and to bring about:

- common regulatory framework and amelioration of national differences in law
- harmonised technical conditions
- facilitation of international roaming services
- ability for EU – wide implementation of novel or upgraded services
- easier cross border frequency coordination between member states
- more efficient economies of scale

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