



NHH's response¹ to the European Commission's Consultation of the 10th of July 2009: 'Transforming the digital dividend opportunity into social benefits and economic growth in Europe'

4 September 2009

A unique opportunity to contribute to economic recovery

NHH welcomes the opportunity to provide input to the European Commission's Consultation „Transforming the digital dividend opportunity into social benefits and economic growth in Europe”.

In the next couple of years, an additional and significant amount of spectrum will become available all across the EU, due to the switch from analogue to digital broadcasting. NHH is convinced that the digital dividend is a once-in-a-generation opportunity not only for the market players or consumers, but also for the EU's economy as a whole and this should be fully recognised in these challenging economic times.

In NHH's view, in order to exploit the full benefit the digital dividend offers to European economies a coordinated approach towards this high quality spectrum is needed in order to give the industry the scale, the leverage to improve broadcasting services and to spur the development of innovative and cross-border electronic communications services.

Therefore we very much support the Commission's timely initiative aimed at starting a dialogue among stakeholders on the use of digital dividend in Europe.

A common way forward: towards an EU roadmap

NHH agrees that an EU roadmap needs to be prepared in order to fully exploit the opportunity arising from the freeing up of spectrum as a result of the digital switchover. We are in favour of the general principles set out in the Consultation document, such as sufficient flexibility (taking into account national circumstances) and strong involvement of the European Parliament and Council.

¹ Disclaimer: Please note that this opinion is compiled by the National Communications Authority of Hungary. It can not be considered as official opinion of the Hungarian Government.



Proposed elements for a roadmap

NHH is supportive concerning the proposed elements of the European roadmap. In our opinion they provide appropriate initiatives and constitute a pragmatic way forward to minimise EU-level uncertainty and facilitate more effective coordination.

We are also convinced that special attention needs to be devoted to more efficient use of available spectrum, therefore we welcome that the proposed roadmap will focus on ensuring high quality standards for terrestrial digital television (e.g. MPEG-4 and DVB-T2) and also on increasing digital dividend by the means of further efficiency gains.

NHH particularly welcomes the Commission's approach to release the so-called 800 MHz band (790-862 MHz) on an EU-wide coordinated basis and under harmonised technical conditions, following the principle of technology and service neutrality whereby making available this sub-band for electronic communications networks and services other than broadcast transmission. NHH also agrees with the initiative that Member States should show commitment to the digital dividend policy at international level by adhering to footnote 5.316 of the ITU Radio Regulations at the forthcoming WRC-11.

In this context, with regard to the fact that WRC preparations of EU Member States are carried out jointly within the ECC's Conference Preparatory Group (CPG), we recommend that the Radio Spectrum Committee should give a mandate to ECC that CPG should elaborate a common method for countries concerned about joining the footnote RR 5.316.

NHH recognises that the significant number of Hungary's neighbouring states combined with the relatively small size of the country may limit Hungary's opportunity to reap the benefits of the digital dividend unless effective cross-border frequency coordination takes place. As 3 out of 7 Hungary's neighbouring countries are non-EU countries, we believe that there is merit in providing assistance by the Commission to Member States in their negotiations with non-EU countries.

Considering our challenges of cross-border frequency coordination, NHH agrees that the exchange of information on Single Frequency Networks (SFNs) deployment and best practices would be helpful. Furthermore, NHH also believes that an agreement among EU Member States (and neighbouring third countries located at the outer borders of the EU) could be realized within CEPT which could analyse the possibility of deployment of SFNs promoting more efficient use of frequencies under a mandate.



Urgent actions

NHH is also in favour of the proposed urgent actions. Hungary has already confirmed the switch-off date in national law and support the proposal that Member States are requested to reaffirm their commitment to the EU target date.

We also welcome the recommendation that Member States should refrain from any regulatory action regarding the use of the 800 MHz band that would contradict, or complicate the application of, the technical harmonisation measure being planned at EU level.