

## **Huawei Response**

### **To the European Commission Public Consultation document**

#### **“Transforming the digital dividend opportunity into social benefits and economic growth in Europe”**

#### INTRODUCTION

It is a great pleasure for Huawei to provide its feedback to this Public Consultation which represents an additional sign of the attention paid by the EC to the media and telecommunications field. Huawei applauds EC efforts in spectrum management in EU and greatly shares the vision for pan European coordination, spectrum liberalization and technology neutrality.

Huawei fully supports the target of reaching a common spectrum plan at EU level to be driven by a shared “EU roadmap” as expressed in the Consultation document from the Commission. The following text is meant to underline the five issues which Huawei, as one of the leading telecommunication vendors, considers fundamental for optimal utilization of the Digital Dividend in Europe.

- A. DIGITAL DIVIDEND IS KEY TO EUROPEAN WIRELESS BROADBAND COMMUNICATIONS
- B. “EU ROADMAP” FOR FASTEST POSSIBLE DIGITAL DIVIDEND REDISTRIBUTION IN LINE WITH RECENT EU SOCIO ECONOMIC DEVELOPMENTS
- C. “EU ROADMAP” FOR PAN-EU COORDINATION
- D. FULL ALIGNMENT BETWEEN THE DIGITAL DIVIDEND REDISTRIBUTION DECISIONS AND THE ANALOGUE TV SWITCH OFF PROCESS
- E. IMPROVING SPECTRUM MANAGEMENT CAPABILITIES IN NEXT GENERATION WIRELESS BROADBAND

## A. DIGITAL DIVIDEND IS KEY TO EUROPEAN WIRELESS BROADBAND COMMUNICATIONS

Wireless Broadband clearly needs below 1GHz spectrum assignments to guarantee the “win-win” between the end users (receiving better quality services at affordable prices) and the Operators (initiating profitable new business).

The European Institutions, Operators and National Regulators are working together on the 900MHz band refarming which will soon allow wireless broadband applications across the spectrum that was initially assigned to GSM voice communications. Although this represents an important step, the current high utilization of this band, the slow end user devices replacement rate and the limited amount of bandwidth available in most cases, will limit the Operators’ capabilities to introduce new broadband services in the existing 900MHz band.

Only the combination of 800MHz<sup>1</sup> and 900MHz bands can allow Operators to equally compete in a healthy wireless broadband communications market.

Assigning the 800MHz band to wireless broadband communications in Europe will be key to guarantee prosperous ubiquitous broadband communication services with certain socio-economic benefits for Citizens, Operators and the Industry in Europe.  
Similar conclusions have been reached across other Regions of the World.

## B. “EU ROADMAP” FOR FASTEST POSSIBLE DIGITAL DIVIDEND REDISTRIBUTION IN LINE WITH RECENT EU SOCIO ECONOMIC DEVELOPMENTS

Huawei welcomes the conclusion reached by the European Commission for which the wireless communications can be a driver for the European economic system.

Looking at today’s European frequency assignments:

- Below 1GHz EU assignments (most valuable portion of spectrum): analogue TV has been assigned ca. 450MHz while wireless communications have been assigned 70MHz only<sup>2</sup>;

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<sup>1</sup> “800MHz” is commonly used as the portion of spectrum that is expected to be available for wireless communications as a result of the Digital Dividend spectrum reorganization.

<sup>2</sup> This is not considering the 8MHz that have been assigned to GSM-R in Europe.

- Below 2100MHz EU assignments: broadcasting TV has been assigned ca. 450MHz while wireless communications have been assigned 370MHz.

Current assignments are not providing enough spectrum to wireless communications especially when considering the now booming ubiquitous broadband demand.

There are at least two key factors for which the current balance between UHF assignments for different applications should change as soon as procedurally possible:

1. The European social economic clear trend showing significant shift of interest from TV broadcasting services towards internet-related forms of broadband communications with a sharply increasing role of wireless (i.e. “ubiquitous broadband access for all”)<sup>3</sup> ;
2. The advent of Digital TV allows delivering more content in a significantly smaller portion of spectrum compared to Analogue TV.

As stated in the Consultation document, the Digital Dividend is the great opportunity to start redistributing the available spectrum according to the recent developments.

Huawei believes that the shared “EU roadmap” (offering sufficient flexibility as described in the Consultation document) can be the appropriate means to speed up the Digital Dividend spectrum redistribution process.

Following the market driven approach, the new 800MHz band EU spectrum allocations (deriving from Digital Dividend reorganization) should be redistributed AS SOON AS POSSIBLE reflecting the great socio economic relevance that the wireless broadband communications have gained and its unquestionable huge potential for the future. Adoption of a shared “EU ROADMAP” would be the appropriate means to reach this target.

### C. “EU ROADMAP” FOR PAN-EU COORDINATION

Now that consensus on a European approach on Digital Dividend redistribution is becoming available, it is of utmost importance that Member States are encouraged to take decisions aiming at the fastest path to pan EU harmonization.

From the vendor and the whole industry ecosystem point of view, coordination among Member States is a mandatory target in order to reach the required economies of scale which can drive the success of a healthy market.

Focussing at possible future assignments of the upper portion of the Digital Dividend to telecommunication applications, some EU National Regulators are now designing multi-band

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<sup>3</sup> As reported in the French “Rapport de la Commission du Dividende Numerique au Premier Ministre” edited by the Commission du dividende numérique - [http://www.dividendenumerique.fr/pdf/Rapport\\_de\\_la\\_CDN\\_-\\_23\\_Juillet\\_2008\\_-final.pdf](http://www.dividendenumerique.fr/pdf/Rapport_de_la_CDN_-_23_Juillet_2008_-final.pdf).

auctions which will include the 800MHz band (Germany will be the first one in time), other Countries will wait until 2015 (as defined by ITU WRC-07 decisions) while some other Countries have not yet declared their official plans.

A shared “EU roadmap” will help vendors in their planning decisions and will be fundamental in eliminating uncertainties on the analogue switch-off process, creating the conditions for a healthy vendor ecosystem.

“EU ROADMAP” to push for pan-EU coordination facilitating telecommunications vendors investments in the 800MHz band.

#### D. FULL ALIGNMENT BETWEEN THE DIGITAL DIVIDEND REDISTRIBUTION DECISIONS AND THE ANALOGUE TV SWITCH OFF PROCESS

Huawei fully understands that local conditions will have impacts on the speed of the EU local Regulators, nevertheless coordinated actions at EU level are necessary at this time to make sure that the ongoing Analogue TV switch-off process in the various Countries will finally lead to the appropriate new spectrum layout by 2012 (i.e. compatible with EC plans for the Digital Dividend) without requiring additional spectrum rearrangements in 2015 (i.e. a second switch-off) which would clearly have negative impact on the end users and on the competitiveness of Europe’s information and media sector.

Regardless of when the Member States will be able to allow wireless broadband in the 800MHz band (2015 at the latest) it is crucial to adopt a forward looking approach which assures that the current analogue switch-off process (to be completed within 2012) in all Member States will be in line with the upcoming Digital Dividend redistribution decisions.

#### E. IMPROVING SPECTRUM MANAGEMENT CAPABILITIES IN NEXT GENERATION WIRELESS BROADBAND

Huawei is actively participating in research activities on the spectrum management capabilities of the future wireless communication systems, taking the European Commission roadmap into account. Huawei research efforts specifically address more flexible



telecommunication frequency utilization techniques as well as driving the spectrum efficiencies beyond the current limits.

Huawei is providing its leading contribution to the industry efforts in the related standardization process, with particular focus on 3GPP work streams beyond Release 8, welcoming the willingness of the European Commission to fund this direction.

Huawei encourages EU research initiatives to continuously improve the spectrum management capabilities of wireless broadband technologies in terms of flexibility and efficiency.