

NLkabel and its members, the operators of coaxial networks for the distribution of radio and television signals in the Netherlands, like to use the opportunity to comment on the EC's Spectrum Policy Unit's document: "Transforming the digital dividend opportunity into social benefits and economic growth in Europe"

NLkabel is the Association of Dutch Cable Operators. It contributes to the awareness of the capabilities of the cable. NLkabel is committed, inter alia, to realise better laws and regulations, standardization of technology and communication on the cable industry. More information about NLkabel, its members and the Dutch cable industry in general can be found at www.NLkabel.nl.

NLkabel is very worried about the negative effects that a future use of the 790-862 MHz spectrum by a mobile application like LTE will have on the undisturbed reception of TV signals and the operation of Internet access modems via cable. This worry is mainly caused by the fact that an exhaustive analyses of the negative effect, economic and operational, has not yet been carried out whilst alone in the Netherlands there may be severe negative impact on the viewing and Internet access experiences of almost 6 million people that subscribe to cable services.

The Netherlands do not have so-called rural areas like countries as France and Germany. Broadband access coverage is realised via fixed infrastructures already for 98,25% of homes by DSL and for 98% by a cable infrastructure. High speed internet (50 Mbps and faster) is available for over 92 percent of Dutch homes via cable using EuroDOCSIS 3.0. For these reasons the need to use the UHF band to cover 'white spots' with broadband does not exist in the Netherlands.

Cable operators in the Netherlands have been using the entire 862 MHz frequency band since the start of cable television at the end of 1970. All the networks and services of cable operators are and have been designed on the basis of co-using frequencies from broadcast over-the-air applications. Cable network services withstand the possible interference from broadcast over-the-air services on the condition that their in-home signal level is low and the distance between the home and the broadcast transmit antenna is sufficient. The in home cabling system, provided it complies to agreed specifications, is designed to withstand these interfering signals. That is quite different when mobile applications working on the same frequencies appear in the home, especially for the sending part of the mobile terminal/phone. Such an application produces a higher disturbing signal level in the home, and causes interference to the viewing and Internet access experiences of almost 6 million Dutch subscribers to cable services and imposes a negative impact upon the business of Dutch cable operators.

For a detailed response to the consultation document we refer to the (attached) [response by Cable Europe](#).