

Position Paper

Long-term strategy for the future use of the UHF band (470–790 MHz) in the European Union

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BITKOM represents more than 2,200 companies in the digital sector, including 1,400 direct members. With more than 700,000 employees, our members generate a domestic turnover of 140 billion Euros a year, exporting high-tech goods and services worth another 50 billion Euros. Comprising 1,000 small and medium-sized businesses as well as more than 200 start-ups and nearly all global players, BITKOM' members offer a wide range of software technologies, IT-services, and telecommunications or internet services. They produce hardware and consumer electronics or operate in the sectors of digital media and the network industry. 76 percent of the companies' headquarters are located in Germany with an additional amount of 10 percent in other countries of the EU and 9 percent in the USA as well as 5 percent in other regions. BITKOM supports an innovative economic policy by focussing the modernization of the education sector and a future-oriented network policy.

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Introduction

The Radio Spectrum Policy Group (RSPG) of the European Commission has presented its opinion regarding the long-term strategy for the future use of the UHF band (470–790 MHz) in the European Union as a draft for consultation¹. BITKOM is taking the opportunity to comment on this paper and outline further ideas.

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Strategy for the 700 MHz band

- BITKOM supports the RSPG's plan to make the 700 MHz band available for the mobile service in a two-step process: (a) preparation of a harmonised 700 MHz band plan and (b) definition of the latest date for availability.
- The 700 MHz band plan currently being coordinated and harmonised within CEPT – based on a 2 x 30 MHz spectrum for the public mobile service – should be refined in order to account for the needs of all market participants. In this respect, BITKOM also refers to its position paper "700 MHz and 1,800 MHz – Größtmögliche Bandbreite für den öffentlichen Mobilfunk"².
- In particular, BITKOM welcomes the current discussion in CEPT regarding the use of the sub-band 738–758 MHz for Supplemental Downlink (SDL).

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¹ see <http://rspg-spectrum.eu/public-consultations/>

² see http://www.bitkom.org/de/themen/54882_80127.aspx

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- We share the view of the RSPG with respect to the latest possible target date in 2020 for pan-European availability of the 700 MHz band. Later availability would have negative consequences for Europe:
 - The economies of scale – based, among other things, on the compatibility of the European 700 MHz band plan with the APT band plan – would not be realised for the European market to the desired extent and/or only with a substantial delay; this would in turn disadvantage licensees in those countries that allocate the spectrum early (e. g. Germany, Italy, France).
 - A substantial delay in the availability of the 700 MHz spectrum in neighbouring EU member states (of e. g. Germany, France) would greatly limit the ability to use frequencies in border regions so that numerous rural areas would not be able to benefit from broadband mobile communication services within the 700 MHz spectrum.
 - Member states targeting a contribution of mobile broadband communication in the 700 MHz band to the Digital Agenda for Europe need to have made available the 700 MHz band latest by the year 2020.

- In order for the 700 MHz band to be available by no later than 2020, relevant coordination efforts must be made in advance; this involves coordinating the process of freeing up the national spectrum and pan-European replanning of the frequency including the coordination of limits. BITKOM is supporting the "End of 2017" deadline proposed by the RSPG.
- Based on our experience, payment terms are an effective means of accelerating the rate at which the spectrum in EU member states is made available. In the case of the 700 MHz band, there are a number of ways for the commission to create corresponding incentives. A corresponding EU regulation could facilitate this process – for example, through the introduction of fines in the event of delayed availability of the 700 MHz spectrum (e. g. > 2020).
- Rights to use frequencies obtained in connection with the national awards procedure should be payable only as the spectrum in the respective EU member state or parts thereof becomes physically available.

Long-term strategy for the 470–694 MHz band

- BITKOM understands that the use of DVB-T/T2 will have priority in the 470–694 MHz frequency band in many European countries until 2030.
- However, there are numerous EU member states where the 470–694 MHz frequency band is not intensively used by DVB-T/T2, neither at the moment nor over the coming years. Thus reserving this spectrum for DVB-T/T2 exclusively no longer makes sense in these countries.

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- In this case, making it possible for the applicable EU member states to migrate early on (if applicable, in part) is very appropriate in the sense of the "Single European Market".
- The RSPG should therefore provide assistance with corresponding technical investigations and potential (partial) migration scenarios that analyse in more detail the coexistence of the mobile service and DVB-T/T2 (e. g. convergence of mobile communication/DVB-T/T2 or SDL).
- BITKOM believes that agenda item 1.1 of the WRC-15 (consideration of additional spectrum allocations to the mobile service on a primary basis and identification of additional frequency bands for International Mobile Telecommunications (IMT)) offers a good opportunity for making available more globally harmonised spectrum for IMT in cooperation with other ITU regions. Co-primary allocation of the 470-694 MHz band to the mobile service gives Europe the flexibility it needs to decide further down the road as to how the band will be used in future.

Summary

The timely harmonised assignment of at least 2 x 30 MHz within the 700 MHz band to public mobile service operators can significantly contribute to supporting the targets of the Digital Agenda for Europe.

In further steps, additional frequency resources for the mobile service could be created using SDL within the 470–694 MHz band where the spectrum is not intensively used by DVB-T/T2 in order to also make convergent services available where desired. In this respect European member states should support a co-primary allocation of the 470–694 MHz band to IMT under agenda item 1.1 of the WRC-15.