

ETNO response to the “Public consultation on the Lamy Report: the future use of the UHF TV broadcasting band”



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About ETNO

ETNO (the European Telecommunications Network Operators' Association - www.etno.eu) represents Europe's telecommunications network operators and is the principal policy group for European e-communications network operators. ETNO's primary purpose is to promote a positive policy environment allowing the EU telecommunications sector to deliver best quality services to consumers and businesses. ETNO members account for 60% of the total investment in European networks.

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1. Executive Summary

ETNO welcomes the opportunity to provide its comments on the Lamy Report on a long-term policy strategy for the future use of the UHF band (470-790 MHz).

It is more and more evident that mobile broadband networks need new capacity. To achieve this goal, telecom operators need new spectrum resources to be allocated to mobile services and identified for IMT applications in the near future.

Therefore, ETNO shares the idea expressed in the Lamy Report that the 694-790 MHz band (the 700 MHz band) should be cleared from the broadcasting applications and identified for IMT applications by 2020. Nevertheless, Member States should have the

necessary flexibility to allow for an earlier start of this process, provided that the cross-border coordination with neighboring countries has been concluded.

Finally, ETNO firmly believes that a mobile co-primary allocation of the 470-694 MHz band in Region 1 should occur at the World Radiocommunication Conference 2015 (WRC-15). Such an allocation would allow the performing of the necessary studies for the future use of this band, with the aim to review the allocation status at the beginning of the next decade.

2. Introduction

ETNO welcomes the opportunity to provide its comments on the Lamy Report on a long-term policy strategy for the future use of the UHF band (470-790 MHz).

As the association of the leading European telecom network operators we have always recognized the importance of a long-term policy strategy in this specific field.

The following are ETNO comments related to the Lamy Report.

3. ETNO Comments

The UHF band, in general, is considered a very important band and a long-term strategic policy is needed on the future convergence between broadcasting and mobile platforms and the delivering of media/audiovisual services and high audience video and data to mobile devices.

As correctly stated in the report when referring to the *“the original UHF broadcasting band (470-862 MHz)”*, *“mobile operators also need such lower frequencies, in particular for bringing broadband services, such as the Internet, into rural areas, in line with the policy objectives set out in the Digital Agenda for Europe, but also for optimal in-building service in densely built urban areas”*.

For this reason, ETNO shares the idea expressed in the Lamy Report that the 694-790 MHz band (the 700 MHz band) should be cleared from the broadcasting applications and identified for IMT applications by 2020. Nevertheless, Member States should have the necessary flexibility to allow for an earlier start of this process, provided that the cross-border coordination with neighboring countries has been concluded.

A common roadmap within the EU defining the harmonization conditions would facilitate the transition. As cross-border coordination is a crucial element, ETNO

endorses the RSPG opinion that a date should be set, around the end of 2017, for the completion of the cross-border coordination.

Cross-border negotiations, as well as negotiations with non-EU neighbouring countries should start in a timely manner to ensure that all necessary agreements will be finalized in time for the starting date of the process of assigning the 700 MHz band to the ECS services.

ETNO participates in several initiatives on the future use of the lower UHF band (470-694 MHz) and although *“the 700 MHz band is not immediately needed for the mobile sector”* as stated in the report, a clear strategy is needed and therefore ETNO welcomes any policy action leading to the development of a long-term strategy on the future of this band.

So, as also expressed in the reply to the draft RSPG opinion on WRC-15 as well as in the reply to the draft RSPG Opinion on a long-term strategy on the future use of the UHF band (470-790 MHz) in the European Union, ETNO firmly believes that a mobile co-primary allocation of the 470-694 MHz band in Region 1 should occur at the WRC-15. Such an allocation is a necessary prerequisite for a sound reflection on the future of this band. It would also allow the studies for the future use of the this band to be performed, including but not limited to wireless broadband supplemental downlink, with the aim to review the allocation status at the beginning of the next decade.