



## Response to Consultation

### **ComReg's response to the European Commission's Consultation of the 10<sup>th</sup> of July 2009: 'Transforming the digital dividend opportunity into social benefits and economic growth in Europe'**

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## Foreword

The switch from analogue to digital broadcasting and the efficiencies this provides, gives rise to a spectrum dividend, called the “digital dividend”, and also drives a once in a generation opportunity for the Member States of the European Union. This digital dividend has the facility not only to support new types of broadcasting products and services but also, in freeing up significant amounts of ultra high frequency (UHF) spectrum, to enable new and innovative communications products and services for the benefit of the citizens of the Community. ComReg took the first steps on its Digital Dividend journey in devoting its National Conference in 2008 to Digital Dividend and with the publication of a consultation in March 2009<sup>1</sup>.

Given the importance of this unique opportunity for Europe, the Commission for Communications Regulation (ComReg) believes it is critical that all the major opportunities and challenges are identified and considered by the appropriate stakeholders in a timely manner so as to ensure that citizens benefit as fully and as quickly as possible. ComReg also recognises that the relatively small size of Ireland's population, 4.2 million<sup>2</sup>, implies that such an economic market may limit Ireland's opportunity to achieve, or to permit suppliers to achieve scale economies. Similarly, in order to maximise any value or benefits from a Digital Dividend, any allocation of such radiofrequency spectrum needs to be particularly cognisant of market developments both in Europe and Internationally.

The digital dividend will have a lasting and beneficial impact on the electronic communications sector in Ireland and in Europe generally and it is therefore critical that all the relevant stakeholders are engaged as early as possible in the process. We look forward to working with Government, other relevant state agencies, and our European partners to ensure that Ireland in collaboration with other European states can maximise the benefits from its digital dividend.

In this regard, ComReg very much welcomes this timely consultation from the European Commission. Ireland is all too well aware of the benefits to be accrued in aligning with larger market economies.

**John Doherty,  
Chairperson, Commission for Communications Regulation.**

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<sup>1</sup> [Digital Dividend in Ireland: A new approach to spectrum use in the UHF band. 09/15](#)

<sup>2</sup> Census 2006, CSO

## **1 ComReg Response to Consultation Issues**

### **General**

The Commission for Communications Regulation (ComReg) agrees with the EC assessment that the provision of broadband to rural areas will be greatly facilitated by the use of wireless technologies and access to the digital dividend spectrum will play an important role in this regard.

ComReg notes that the consultation document refers to a set of actions in order to meet short-term as well as medium to long-term objectives. The document, however, does not set out what those objectives are. ComReg believes that this weakens the document, as the proposed actions should be linked in a transparent way to the objectives of the European Commission.

### **1.1 Improving consumers' experience by ensuring high quality standards for terrestrial digital television receivers in Europe**

#### **a. Ensuring the availability of a compression standard on all DTT receivers sold after 1 January 2012 that is at least as efficient as the H264/MPEG-4 AVC standard.**

Response:

ComReg supports the principle of spectrum efficiency and understands the role that higher data compression standards can play in obtaining this goal.

In this context, while it has no principled objection to EC action to stipulate an efficient compression standard, ComReg believes that the natural evolution of the market is already towards the use of higher compression standards and the imposition of an EU stipulation or recommendation may be therefore be unnecessary. ComReg notes that all Member States who have launched a DTT service in the last 12 months have launched an MPEG-4 compatible service. While the current availability of receivers and mass market economies of scale may have supported at the time the launch of a service using the MPEG-2 standard, similar to that currently available in the UK, RTÉ, Ireland's national broadcaster for example, recognised that the market is heading in the direction of technologies which use spectrum more efficiently and has stated that it plans to launch its DTT service using the MPEG-4 standard.

#### **b. Setting standards for the ability of digital TV receivers to resist interference.**

Response:

ComReg believes that there is merit in defining minimum interference-rejection standards for all DTT receivers. Additionally such standards should also be defined for ECN/ECS services as this issue is two sided. A holistic approach should

therefore be adopted to ensure that both services can operate in such a way as to minimise mutual interference.

## **1.2 Increasing the size of the digital dividend through further spectrum efficiency gains**

### **a. Promoting collaboration between Member States to share future broadcasting network deployment plans (e.g. migration to MPEG-4 or DVB-T2).**

Response:

In the case of Ireland, ComReg believes that there is no need for the EC to act as a facilitator or produce guidelines on the promotion of collaboration between Member States for the sharing of future broadcasting deployment plans. Ireland has a very good working relationship with our neighbouring Member States which is maintained through ongoing spectrum co-ordination and regular bilateral meetings. ComReg, however, recognises that there is a key role for the EC to play in the context of facilitating frequency coordination with non-EU countries – see 1.6 below.

### **b. Encouraging the deployment of Single Frequency Networks (SFNs).**

Response:

ComReg agrees that the exchange of information on SFN deployment would be helpful to Member States. However, in relation to the deployment of SFN, ComReg believes that individual Member States are best placed to consider this in the context of existing national broadcasting topologies.

### **c. Supporting research into "frequency agile" mobile communications systems.**

Response:

ComReg agrees that research into "frequency agile" mobile communications systems would be of benefit to all Member States. The UHF band is a finite spectrum resource and devices that use this spectrum more efficiently will maximise the benefit of this finite resource.

## **1.3 Making the 800 MHz band available for low/medium power electronic communications networks, under harmonised technical conditions, following the principle of technology and service neutrality.**

Response:

ComReg agrees with the principle of releasing the 800 MHz band on a coordinated non-mandatory, service and technology neutral basis and believes that any EU

harmonisation of technical elements should be based upon the outcome of CEPT studies in response to the relevant EC mandates.

ComReg notes the Commission's reference to Member States' commitment to the digital dividend policy at an international level by adhering to footnote 5.316. ComReg believes that any decision on entering relevant ITU footnotes is a matter for the Member State, having regard to their own individual context .

#### **1.4 Adopting a common position on the potential use of the "white spaces" as part of a possible extension of the digital dividend**

Response:

ComReg strongly supports an EC-led investigation into the feasibility of adopting a common European position on the use of white spaces by cognitive radio technologies. To this end ComReg encourages the EC to invest funding in this area in order to stimulate further research and speed up the delivery of mass market consumer devices using cognitive technology to maximise the use of the "White Spaces".

#### **1.5 Ensuring the continuity and further development of wireless microphone applications and other secondary uses of the UHF spectrum**

Response:

ComReg believes that further work is required to facilitate the use of wireless microphone applications and PMSE in the UHF spectrum. ComReg believes that such work is best carried out at a European level and notes the studies in progress by CEPT on this. ComReg considers that, in the context of finding a solution for PMSE, wireless microphone and PMSE users should lead the way forward in the take up of cognitive technologies that can use the "White Spaces". To this end European harmonisation of the relevant standards may be required to ensure economies of scale develop and that the use of cognitive technologies becomes the de facto way forward for all PMSE and wireless microphone uses.

#### **1.6 More effective cross-border coordination with non-EU countries**

Response:

Although unlikely to be affected by a requirement to coordinate frequency usage with non-EU countries, ComReg, in keeping with the draft RSPG opinion on the digital dividend, considers that there is a key role for the EC in facilitating frequency coordination between other Member States and non-EU countries as appropriate.

#### **1.7 Addressing future challenges**

Response:

ComReg would welcome active monitoring of developments by the EC, in conjunction with Member States. Any 'roadmap' developed by the EC should be flexible enough to adopt and evolve to the dynamic environment that is radio spectrum.

**1.8 Taking steps towards the opening of the 800 MHz band for electronic communications services by adopting harmonised technical conditions of use in Europe**

Response:

ComReg agrees with the principle of releasing the 800MHz band on a service and technology neutral basis and in this context, supports the adoption of European technical harmonisation measures which should be based upon the outcome of the CEPT studies in response to the relevant EC mandates.