

## Comments on Ofcom's Consultation on the Digital Dividend: 600 MHz band and geographic interleaved spectrum

The Voice on the Net Coalition Europe ("VON") welcomes the opportunity to comment on Ofcom's Consultation on the Digital Dividend: 600 MHz band and geographic interleaved spectrum (hereafter "the Consultation").

VON's comments will focus on questions 6, 7, and 10 i.e.:

*Question 6: Do you have any comments on non-technical licence issues and the way we propose to approach them?*

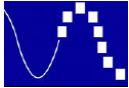
*Question 7: Do you have any comments on our assessment of the most likely uses of the 600 MHz band and geographic interleaved spectrum? Are there any potential uses we have not mentioned that should be considered?*

*Question 10: Do you have any comments on our intention to maintain a market-led approach to awarding the 600 MHz band and geographic interleaved spectrum?*

In the Consultation, Ofcom states that "*There is a wide range of potential uses of this spectrum, the most likely of which appear to be DTT and mobile broadband alongside others including mobile multimedia services (MMS e.g. mobile television), programme making and special events (PMSE), broadband wireless access (BWA) and communications for the emergency services. We consider each in turn and ask for stakeholders' views on these and any other potential uses. Our assessment takes into account the spectrum likely to be available and the likely technical constraints on its use. We also look at whether there may be distinctive considerations and uses in the nations and regions of the UK.*"

For VON, the principles of technological and service neutrality must remain at the heart of any decision Ofcom takes. Radio spectrum is recognised as an increasingly important link in the delivery of broadband network access, especially to areas that might otherwise be underserved. Radio spectrum in a mobile environment also represents a new opportunity for innovation to the benefit of citizens, administrations and the economy as a whole.

Radio spectrum can support a multiplicity of technical solutions, which makes it an optimal tool for enabling many advanced and innovative communication and information society services. Full utilisation of spectrum (and preferably harmonised utilisation across Europe) will therefore be critical to the achievement of the objectives of the European Digital Agenda and the UK government's own ambitious plans, notably under the *Digital Britain Final Report*. Which applications and services could potentially run over the 600 MHz band should not so much be Ofcom's concern, as the fact that it should be attributed in a manner that responds to effective needs of consumers and businesses, and under a methodology that encourages the most efficient use.



## VON Europe Comments on Ofcom's Digital Dividend Consultation

As regards the use of a market-led approach, VON believes that the introduction of more licence-exempt spectrum and spectrum trading is the best approach to increase efficiencies in the management of spectrum. We therefore encourage Ofcom to implement such an approach.

In particular, we regard the availability of licence-exempt spectrum in the frequencies below 1 GHz as critical to the success of any programmes for the collective use of spectrum. The propagation characteristics in the bands below 1 GHz allow for the delivery of communications capabilities through obstructions and over long distances, which will be invaluable for many next generation services in inner city and rural areas where geographic obstacles prove too great for the use of other frequencies.

In addition, VON suggests that Ofcom consider further development of policies for collective spectrum use by making any chronically unused portions of license-able spectrum -- so-called "white spaces" -- available on a licence-exempt basis. White spaces by definition are an under-exploited resource despite advances such as software-defined radio and smart antennas that can be used to minimise interference with services that are licensed on a primary basis.

VON believes the switchover to digital television and the subsequent management of the digital dividend provides a particularly opportune moment for the introduction of a harmonised policy on spectrum management and the adoption of rules that permit the most efficient use of unused spectrum in the allocated spectrum for TV broadcasting in particular.

We thank you in advance for taking consideration of these views. Feel free to contact Caroline De Cock, Executive Director VON Europe, by phone (+ 32 (0)474 840515) or email ([cdc@voneurope.eu](mailto:cdc@voneurope.eu)) should you need further information.

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**ABOUT VON Europe:** VON Europe consists of leading VoIP companies, on the cutting edge of developing and delivering voice innovations over Internet. The coalition, which includes iBasis, Google, Microsoft, Skype and Voxtel, works to advance regulatory policies that enable Europeans to take advantage of the full promise and potential of VoIP. The Coalition believes that with the right public policies, Internet based voice advances can make talking more affordable, businesses more productive, jobs more plentiful, the Internet more valuable, and Europeans more safe and secure.

More information on VON Europe can be found at [www.voneurope.eu](http://www.voneurope.eu)