

## **Introduction**

Nortel welcomes the opportunity to comment on the consultation “Digital dividend: clearing the 800 MHz band”.

In overview, Nortel supports Ofcom’s reassessment of the band plan and its intention to align 72MHz of spectrum at the top of the band with other European countries. We believe that by aligning and thus simplifying cross-border coordination, the release of spectrum for mobile use in the 2010 timeframe is both feasible and desirable.

In a number of areas, in particular dealing with costs of migrating television broadcast and PMSE we have chosen to make ‘no comment’ on the basis that other legitimate stakeholders are better placed to respond to these points.

## **Responses to Questions**

*Question 1. Do you agree that clearing DTT from channels 61 and 62 and PMSE from channel 69 to align the upper band of cleared spectrum in the UK with the emerging digital dividend in other European countries is likely to further the interests of citizens and consumers to the greatest extent?*

Nortel agrees that aligning the UK digital dividend with that of other European countries is the option most likely to deliver benefits not only to citizens and consumers but will benefit the telecommunications industry (by avoiding delays and costs associated with having to develop or procure ‘UK specials’) and enterprise users.

The release of digital dividend spectrum with its excellent propagation characteristics in the 2010 timeframe fits well with technological advances that will be gleaned from LTE and, in due course, LTE Advanced. Together these developments bring absolute cost advantages and thus holds the promise of bringing wireless mobile broadband to a much larger number of users over a greater geographical area than is economically viable with existing systems in existing spectrum.

Nortel believes it will be particularly important to address the concerns of PMSE users; although costs associated will be modest compared with the benefits of aligning the UK digital dividend it will, no doubt, be of concern to the user community. To this end we support Ofcom’s view that an orderly migration be planned and implemented and existing users of this spectrum be compensated in line with ‘best practice’ for such schemes.

### **Moving DTT from channels 61 and 62**

*Question 2. Do you agree that the proposed DTT migration criteria are proportionate and appropriate? If not, please explain why and clearly identify any other criteria you believe should be adopted and why.*

Nortel is supportive of the views expressed.

*Question 3. Do you have views on the options identified and our assessment of them? Do you believe there are other, superior options, and, if so, why? Do you agree that the hybrid option is most consistent with the DTT migration criteria?*

No comment.

*Question 4. Do you have views on the implementation-timing options identified and our assessment of them? Do you agree that DSO-integrated implementation is most*

consistent with the DTT migration criteria? If not, why not?

No comment.

Question 5. Do you agree that a programme-control and -governance arrangement such as that outlined above is appropriate?

No comment.

Question 6. Do you agree that the four cost categories adequately capture the costs associated with clearing DTT from channels 61 and 62? Are there any costs that do not appear to have been accounted for in any of these categories?

No comment.

Question 7. Do you agree that our cost profile is a reasonable basis for planning the capital expenditure for clearing DTT from channels 61 and 62?

No comment.

#### Moving PMSE from channel 69

*Question 8. Do you agree that these are the most appropriate criteria to assess which spectrum is the best alternative to channel 69 for PMSE?*

The criteria used seem appropriate.

*Question 9. Do you agree with our technical and coverage analysis of the possible alternatives to channel 69 for PMSE?*

In general, yes. The use of the centre gap in the FDD case (the most probable outcome of a future award process) is possibly a better option than portrayed, especially if other CEPT countries also chose to adopt this option.

*Question 10. Do you agree with our economic assessment of the realistic alternatives to channel 69 for PMSE?*

No comment.

*Question 11. Do you agree that channel 38 is the best alternative to channel 69 for PMSE?*

Based on the present available information channel 38 is the best option.

*Question 12. Do you agree that we should award channel 38 to the band manager on the same terms as would have applied to channel 69?*

No comment.

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*Question 13. Do you agree with our proposal to maintain PMSE access to channel 36 on 12 months' notice to cease and to the rest of the cleared spectrum (channels 31-35, 37 and 61-69) until DSO is completed in the UK in late 2012?*

Yes. The Ofcom proposal would enable early use of spectrum for mobile systems.

*Question 14. Do you agree with our approach to determining eligibility for, and our assessment of the level of, funding to move PMSE from channel 69?*

No comment.

*Question 15. Do you agree that three years is long enough for PMSE to move from channel 69?*

No comment.

*Impact assessment*

*Question 16. Do you agree that with our analysis of the key impacts of our policy options? Are there any other key impacts we should assess?*

Nortel agrees with the areas of impact in the present assessment.