

14 June 2011

Dear Sir,

Developing a framework for the long term future of UHF spectrum bands IV and V.

Cable Europe would like to make some comments below on Ofcom's call for inputs on developing a framework for the long term future of UHF spectrum which covers 470MHz to 790MHz.

Cable Europe is concerned that when making any bands of the UHF spectrum available for future use, Ofcom must from the very start of the process consider and actively consult the various stakeholders with services who may be affected by interferences from these new services. A consistent approach across Europe to address these issues should be taken.

Cable Europe notes that cable networks across Europe operate using the same frequencies as in the UHF bands. It is therefore critical that from the very start of any process of considering the release of UHF spectrum and the purposes for which that spectrum might be used, Ofcom should do a thorough impact assessment regarding the potential interference to cable CPE from these new services.

If interference issues – similar to those that have been highlighted in laboratory tests across Europe in the 800MHz band – should arise, the impact on cable companies and their customers could be extremely serious given the large numbers of homes likely to be serviced by cable networks operating in these frequencies.

Cable Europe therefore urges Ofcom to engage early on this issue having regard to the experience on the 800MHz band and to ensure that in dealing with these frequencies, it conducts both comprehensive laboratory testing and field trials.

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