

China Mobile Peoples Telephone Company Limited

("PEOPLES")

Response to

**Consultation on
Digital Broadcasting :
Mobile Television and Related Issues**

("Consultation Paper")

Date of submission: 25 April, 2007

PEOPLES would like to submit its views on the Consultation Paper issued by CITB on 26 January 2007.

All abbreviations have the same meaning as in the Consultation Paper.

(1) We welcome advice on other emerging mobile technologies that support video transmission services and what forward planning the Government should take to facilitate the deployment of such technologies in Hong Kong.

We are aware of the following other possible technologies.

- Streaming over cellular network: EDGE, WCDMA, HSDPA
- Mobile Triple Play: Multimedia Broadcast Multicast Service (MBMS) over WCDMA or HSDPA
- Peer-to-Peer Internet transmission: using WiFi on portable PC, PDA and smartphone.

PEOPLES suggest that the government should monitor the market development of various technologies and adjust the spectrum plan accordingly under a technology neutral approach.

(2) We welcome views and information on the trial or rollout of mobile TV services in other parts of the world and comments on the risks and opportunities afforded by mobile TV services for Hong Kong's communications industry and market.

PEOPLES do not have any first hand information of the trial or rollout of mobile TV services in other parts of the world. In general, PEOPLES feel that the mass market demand for mobile TV, especially live broadcast programmes, is not clear at this stage.

(3) We welcome comments on the above analysis of spectrum availability for digital broadcasting services. In particular, we invite comments on whether the spectrum in Band III and L Band and two SFN multiplexes in the UHF Band should also be made available for mobile TV services, subject to review of the spectrum allocation and assignment arrangements.

The Consultation Paper has summarized the following frequency bands for digital broadcasting.

	Mobile TV	DTT	DAB
Band III (174MHz – 230MHz)	T-DMB, DAB-IP	X	√
L Band (1466MHz – 1480MHz)	T-DMB, DAB-IP and DVB-H	X	√
UHF Band (470MHz – 806MHz)	DVB-H MediaFLO	DVB-T or National standard	X
S Band (2500MHz – 2690MHz)	Assessment to be made after WRC-078 (Oct 07) Broadcasting satellite service may cause interference		

PEOPLES consider that it may be too early to make any decision on the frequency band for the introduction of mobile TV. It seems there is a tendency for a typical consumer to bring along only one single portable device for multiple purposes, i.e. mobile phone, MP3, PDA, etc. The availability of affordable multi-service terminals supporting mobile TV is uncertain at present.

In particular, after the simulcast period of terrestrial TV, there will be substantial amount of spectrum in the UHF Band vacated from analogue broadcasting by 2012.

As stated in the Consultation Paper, S Band is currently allocated as the expansion band of 3G mobile services, in line with ITU recommendation. As mobile telecommunications services have become indispensable to consumers, PEOPLES feel that the S Band must be reserved for future expansion of mobile services.

PEOPLES have a preliminary view that UHF Band may be the most viable band for mobile TV after the simulcast period.

(4) We invite comments on the approach to allocate spectrum resources for the three digital broadcasting services in question. We also welcome any suggestions other than the above three proposed options.

PEOPLES note that the existing licensing approach consists of 2 stages (e.g. 3G mobile services). The 1st stage is to decide the type of service to be deployed for a particular frequency plan through public consultation and/or market analysis. Once the type of service is designated, the bidders are invited to bid for the spectrum and the successful bidders are free to choose the preferred technology among a few open standards unless there are overriding reasons to mandate a particular technology (e.g. CDMA2000).

PEOPLES consider that the existing 2-stage conventional approach should be implemented.

(5) We invite comments on whether, in pursuance of a market-led approach, we should assign the spectrum available in Band III and L Band and the two SFN multiplexes in the UHF Band for relevant digital broadcasting services by auction with appropriate rollout obligations, and whether a SUF should be charged for such uses.

PEOPLES agree in general that appropriate rollout obligations and SUF should be imposed on the assignment of spectrum for commercial services.

(6) We invite comments on whether mobile TV programme services should be licensed under the Broadcasting Ordinance and regulated accordingly through appropriate licensing conditions and codes of practice by the relevant authorities, and if so, how this should be achieved vis-à-vis the current licensing framework.

PEOPLES suggest that the regulatory control on mobile TV should be the same as for 2G & 3G mobile services, i.e. equal treatment.