

Response to Second Consultation on Development of Mobile Television Services

China Mobile Broadcasting Satellite Limited (CMBSat) is currently partnering with the State Administration of Radio, Film, and TV (SARFT) to implement the China Multimedia Mobile Broadcast (CMMB) project with a service roll-out target of Beijing Olympics. CMBSat is responsible for the construction and launch of the S-band satellite (CMBStar) at the specification jointly determined between CMBSat and SARFT. The satellite will operate at the frequency range of 2635 – 2660 MHz and be placed at 115.5° EL. The satellite has two coverage beams – one for Mainland China including Hong Kong, and the other for Taiwan - with an EIRP of 67 dBW for eastern part of China including Hong Kong.

In addition to providing the satellite to the CMMB project, CMBSat actively participates in the various aspects of CMMB project both in the system architecture, eco-system development and in the operations aspect. This involvement is made possible by the presence of Echostar Communications Corporation (Echostar), which is a controlling equity partner in CMBSat. Echostar operates the second largest satellite pay television services network in the US with 14 million subscribers under the service platform of DISH network. CMBSat brings the vast operations experience to the CMMB project.

CMBSat is pursuing mobile television services in Hong Kong riding on the Echostar experience as well as our experience gained in the CMMB project. We treat our Hong Kong mobile television services as an extension of the CMMB project, by leveraging the economy of scale of the R&D efforts already invested by the industry alliance of the CMMB in end-to-end product development and the volume production of consumer handheld terminals.

Spectrum Availability

CMBSat holds strongly the view that the 25 MHz frequency bandwidth of 2635 – 2660 MHz be allocated to CMBSat in pursuit of mobile television broadcast services in Hong Kong due to the following:

1. ITU Allocated Frequency for Mobile Broadcast

WRC 2007 has put the satellite network for this frequency range under protection for mobile broadcast services.

2. ITU Frequency Coordination with Major Adjacent Satellite Networks Completed

Frequency Coordination with Japan, Korea, and Indonesia, who are operating S-band satellite network, is completed.

3. CMBStar Satellite Construction is Nearing Completion for Launch

CMBSat satellite construction is nearing completion, having successfully undergone thermal vacuum test.

4. High EIRP Level of CMBSat over Hong Kong Makes it Impractical for Others to Operate within this Bandwidth

The EIRP level of CMBSat over Hong Kong is 67 dBW, which makes it very difficult for other operators to use this bandwidth.

5. Avoidance of Harmful Interference

CMBSat has done interference analysis with adjacent networks and has reached preliminary conclusions of non-harmful interference with adjacent networks.

Spectrum Allocation

CMBSat advocates a government policy of technology neutral, market-determined services, and pro-mobile stance where at least 50% of the allocated frequency bandwidth is used for mobile television broadcast.

Spectrum Assignment

CMBSat holds the view that the 25 MHz S-band frequency of 2635 – 2660 MHz be allocated to CMBSat free and CMBSat shall pay an agreed upon fixed annual spectrum use fee for its Hong Kong operations. Because of the high EIRP of CMBSat satellite over Hong Kong, it is impractical to hold an auction for this frequency spectrum as it will cause frequency interference. CMBSat is operating the satellite in the CMMB project with SARFT and it is feasible for CMBSat to coordinate the use of the frequency spectrum to avoid interference.

CMBSat supports the market-oriented approach for the frequency assignment with prequalification on service roll-out obligations, and minimum service quality guarantee. CMBSat also supports the removal of cross-holding restrictions for mobile television services.

Licensing Arrangement

CMBSat supports a phased approach to the content regulations. The initial phase should be based on a light-handed approach where mobile television broadcast, be it broadcast type of stream video type, are self-regulated with the industry developed code of regulatory practice. The general law shall apply related to adult content. Conditional access system needs to be in place to restrict access to certain type of content.

As the mobile television service becomes more prevalent and reaches a critical mass, the sub-category of BO on “other licensable television program services” shall apply.

Access to Hilltop Transmission Sites and Geographical Coverage of Broadcast-type Mobile Television

Given the nature of broadcast, it is very important to have access to hilltop transmission sites for the installation of transmission equipment, so that desired coverage can be reached efficiently. Government needs to intervene where the commercial arrangement cannot be reached with existing hilltop transmission sites users.

CMBSat mobile television broadcast services are pay TV services, and we will cover as much area as our business case allows in a phased deployment roll-out. It is not comparable to the coverage of free-to-air TV, and therefore the coverage requirement should not be the same.