

Communications and Technology Branch
Commerce and Economic Development Bureau
2/F, Murray Building
Garden Road
Hong Kong

Re: Ericsson's Response to 2nd Consultation on Development of Mobile Television Services

1. Introduction

Ericsson appreciates this opportunity to provide comments to the Commerce and Economic Development Bureau/OFTA with regard to the consultation paper entitled "Second Consultation on Development of Mobile Television Services" issued on January 29, 2008.

This letter outlines Ericsson's principal views on this consultation which mainly addresses the spectrum issues to support future success of mobile services in Hong Kong.

2. Ericsson's views on Spectrum Availability

- Ericsson supports TA's standpoint in this consultation to reserve 798MHz-806MHz band for IMT services being aligned with the WRC 2007 decision.
- In general, Ericsson recommends the usage of "lower" frequency band (698-790 MHz; 790-806 MHz and 806-862 MHz) for wide area and indoor coverage of IMT services in Hong Kong.

The globally adopted WCDMA has been evolving to meet the increasing market demands for both high-speed data access and broadcast services. In Hong Kong, with its special conditions of high density population and high-rise buildings, the smaller cell sizes of WCDMA/IMT systems would be able to offer total network capacity and indoor coverage that are orders of magnitude higher than those available from high-power terrestrial broadcast systems. Ericsson believes that with the growing popularity of user-generated content and higher expectations of interactivity and personalization among the mobile users in Hong Kong, there will also be growing demand on IMT services which in turn puts requirement on additional spectrums. It is therefore critical to secure new spectrum resources for viable IMT-based mobile broadband or broadcast coverage instead of making more TV channels on terrestrial networks that already are available from alternative distribution channels like copper, cable and satellite.

Ericsson also agrees with TA that the spectrum of 2500MHz-2690MHz in S-band should remain to be reserved for expansion of IMT services only. And in order to eliminate the interference problem with mobile satellite broadcasting services, Ericsson would like to urge TA to further elaborate on the issue with Mainland Authorities for a possible resolution to re-allocate the unpaired centre gap band of 2.5GHz spectrum, i.e. 2575MHz-2615MHz, in supporting CMMB. A total spectrum of 2 x 25MHz on the paired 2.5GHz band could potentially be released for expansion or evolution of WCDMA/IMT services in Hong Kong.

3. Ericsson's views on Spectrum Allocation

Ericsson agrees with TA's proposal on pro-mobile TV approach whereby at least 50% of the transmission capacity, within the spectrum range 678 MHz – 686 MHz, should be used to carry mobile TV content.

4. Ericsson's views on Spectrum Assignment

Ericsson agrees with TA's proposal on the adoption of market-based approach for the assignment of spectrum and the levy of Spectrum Utilisation Fee through auction. TA should also put stringent requirement on rollout obligation to ensure that this valuable spectrum resource is utilised to its full advantage.

Ericsson would like to again thank CEDB/OFTA for the opportunity to comment on this consultation and we believe that further development on mobile TV will benefit consumers and businesses in Hong Kong.

Sincerely,

Michael Lee
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Ericsson Limited, Hong Kong