

April 28th, 2008Communications and Technology Branch
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The FLO Forum would like to congratulate the Commerce and Economic Development Bureau (CEDB) and the Office of the Telecommunications Authority (OFTA) for its ongoing efforts in the matter of releasing and allocating spectrum for new and innovative services in Hong Kong. Therefore, as an open and active global industry organization, we welcome and appreciate the opportunity to respond to the second consultation on “*Development of Mobile Television Services*” which is fully in line with the FLO Forum interests and principle that is, for government and regulator to allocate spectrum for Mobile TV services based on a technology neutral and market-led approach. Such prerequisites will be essential to enable the successful deployment of Mobile TV networks and benefits to consumers. The FLO Forum is pleased to provide our comments on behalf of its 90+ industry members.

The FLO Forum is a contribution-driven international consortium of over ninety-five global industry members who span the entire digital mobile multimedia value chain. The FLO Forum mission is to develop technical specifications and to support the open standardization of the FLO technology globally; to achieve the certification and testing of FLO-based products and services; and to promote appropriate regulation and spectrum policies which will lead to the wide market adoption of mobile multimedia broadcasting services internationally. Our global member companies are headquartered in Greater Asia (38), Europe (25), and in North America (32). Through its member companies, the FLO Forum fully embraces technology neutrality, transparent and clear spectrum rules including harmonization whenever feasible, as well as flexible regulation, all conducive of a global and successful mobile multimedia broadcasting market long term. It is also important to note that the FLO Forum members offer products and services that support various technology combinations FLO, ISDB/T, DVB/H, and DMB in order to leverage from economies of scales mechanism.

Comment [Q1]: To be updated

MediaFLO mobile broadcast platform is based on the FLO air interface and is designed for the efficient point-to-multipoint delivery of high-quality multimedia content, information and applications, including video, audio, Clipcasting™ media, IP datacasting and interactive services. Invented from its inception for mobility and wireless reception, MediaFLO provides increased capacity and coverage at reduced costs for wireless consumers.

MediaFLO is built upon an open and global set of standards supported by a large industry ecosystem and published by the Telecommunications Industry Association (TIA)¹. MediaFLO is also included as

¹ TIA-1099 (Radio interface), TIA-1102 (Receiver minimum performance specification), TIA-1103 (transmitter minimum performance specification), TIA-1104 (Test application protocol) and TIA-1120 (transport specification),

Multimedia System M in an ITU-R Recommendation approved by the International Telecommunication Union Radio Communication Sector². Finally, MediaFLO specifications are in the approval process at the European Telecom Standards Institute (ETSI) with the support of the TIA³.

The FLO Forum members support a variety of mobile broadcast technologies and stand in favor of the technology neutrality principle and therefore welcome and support the proposals of Hong Kong government authorities including the CEDB and OFTA. The Mobile TV market has shown already that multiple technologies can co-exist and that market driven policies benefit the introduction of such a new market. In addition, mobile broadcast multimedia – Mobile TV being a natural application of this service – is to be considered a new convergence service which goes beyond just Mobile TV and represents a great medium for new opportunities for innovative multimedia applications and commercial partnerships leading to new source of revenues for the Hong Kong market. The FLO Forum truly believes that Hong Kong can be a global leader in such a new market. The regulatory framework around this new service will therefore be critical to the long term success of this service in Hong Kong and the FLO Forum applauds the CEDB/OFTA for considering all the key aspects including spectrum availability, flexible regulations, healthy competition and market-based incentives to encourage the industry to mobilize efforts around Mobile broadcast multimedia services launches in Hong Kong. In that sense, Hong Kong appears as a market leader in the Asia region and such policy making approach is more likely to ultimately accelerate market adoption by consumers.

The purpose of this letter is to encourage CEDB/OFTA to pursue its considerations toward the successful introduction of new mobile multimedia broadcasting services and to highlight the importance of technology neutrality along with a light touch regulatory environment and a flexible though predictable and competitive spectrum licensing process.

The FLO Forum overall agrees with CEDB/OFTA consultation especially with regards to technology neutrality and the availability of UHF spectrum multiplexes. With the proposed availability of spectrum based on Single Frequency Network (SFN) is in full compliance with two critical aspects of spectrum management – namely segmentation between services and nationwide SFN configuration– translating into higher efficiency, hence more services at a lower cost. These conditions will ultimately determine incentives for players to make the investments necessary for the adoption of Mobile TV as it is still a nascent service requiring the industry to commit and invest in its success. Such proposals also allow for a high level of competition and provide choices of multimedia services at reasonable costs for the consumers. This will help favor the rapid adoption of the mobile multimedia broadcast market in Hong Kong.

The regulatory and licensing framework will be essential and minimum constraints should be set for this new service to evolve in a conducive and competitive environment. Experience internationally shows significant market interest in Mobile TV but also highlights a more general concern from industry that bottlenecks could arise from an overly restrictive regulatory environment. The FLO Forum therefore encourages CEDB/OFTA to continue seeking and taking the views of the wide range of industry players in the market, in particular service providers and stakeholders (e.g. multimedia service providers and/or wireless carriers) that have the financial incentives to ultimately invest in this new service. We believe

TIA-1132 (Repeater minimum performance specification), and TIA-1130 (Media Adaptation Layer specification)

See <https://www.tiaonline.org/standards/technology/tm3/>.

² ITU-R Recommendation BT.1833 “Broadcasting of multimedia and data applications for mobile reception by handheld receivers” <http://www.itu.int/rec/R-REC-BT.1833/en>

³ In May 2007, ETSI approved a new work item, “Forward Link Only Air Interface Specification for Terrestrial Mobile Multimedia Multicast,” aimed at the publication of an ETSI technical specification for MediaFLO http://webapp.etsi.org/WorkProgram/Report_WorkItem.asp?WKI_ID=25905

that such feedback will be useful to clarify and finalize the policy and regulatory framework for mobile broadcasting services in Hong Kong.

Finally, the FLO Forum would welcome the opportunity to provide CEDB/OFTA with further insight and input regarding regulatory issues via a face-to-face meeting in Hong Kong at your convenience.

Respectfully,



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President, FLO Forum