



Cable Europe

CEPT-ECC

Chairman of Group ECC-PT1

Nansensgade 19, 3rd floor

1366 Copenhagen

Denmark

January 2nd, 2014

SUBJECT: 'Interim Report dated 8 November 2012, document ECC(13)090 Annex 17'

Cable Europe contribution to CEPT-ECC-PT1 meeting in January 13th 2014

Dear Mr. Didier Chauveau,

According to the Letter of Understanding between Cable Europe (formerly ECCA) and CEPT-ECC dated March 2003, Cable Europe has performed a careful analysis of the above mentioned interim Report.

The Interim Report ECC(13)090, Annex 17, dated 8 November 2012, document ECC(13)090, was developed by CEPT as requested by the European Commission according to the draft Mandate¹ given in Annex A of the same report.

After carrying out a thorough analysis, Cable Europe would like to share with CEPT-ECC, in particular, with WG PT1, some concerns that rose from it.

Cable Europe would like to point out that the Interim Report² has not, yet, completely fulfilled the objective set out in the draft Mandate, specifically in what regards to the requirement stated

¹ Mandate to CEPT (2013)317781 to develop harmonised technical conditions for the 694-790MHz ('700MHz') frequency band in the EU for the provision of wireless broadband electronic communications services and other uses in support of EU spectrum policy priorities of March 11th 2013



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on page 6 of the EC Draft Mandate that states - “*CEPT is also requested to collaborate actively with the European Telecommunications Standards Institute (ETSI) which develops harmonised standards for conformity under Directive 1999/5/EC. In this regard, CEPT must indicate the potential impact of the deliverables on this Mandate on non-radio end-user equipment for fixed broadcasting and broadband electronic communications services in support of standardisation work relating to interference mitigation.*”

Cable Europe would like to point out an omission in the Interim Report since, to meet the EC Mandate requirement as given above,” *CEPT must indicate the potential impact of the deliverables on this Mandate on **non-radio end-user equipment for fixed broadcasting and broadband electronic communications services** in support of standardisation work relating to interference mitigation”*, which demonstrates there is still some additional work to be executed.

Cable Europe represents an industry that provides services to more than 64 million consumers in the European Union. This fact urges Cable Europe to demonstrate to CEPT-ECC their concerns regarding the present Interim Report, which has left some aspects to be endorsed. As always, in a constructive basis, Cable Europe is willing to contribute to the ECC work, especially in accordance with our mutual LoU agreement.

This goes also perfectly aligned with the European Commission request for CEPT also collaborate actively with ETSI in this regard.

Therefore, Cable Europe respectfully requests that the Interim Report shall include a section that addresses the EC Mandate, as above.

Until this section is fully addressed, the current Interim Report, in order to correctly reflect the current status, shall include in section 4, a task (4) that addresses this requirement as set out in the EC Mandate and shall also include a place holder for a new Section 7, ‘Coexistence Between Wireless Broadband And Fixed Broadband Electronic Communication Services’.

Cable Europe is aware that the report is an ongoing work and, therefore, these present contributions aim to bring elements that will further turn it into a document as exhaustive as

² Interim Report from CEPT to the European Commission in response to the Mandate “to develop harmonised technical conditions for the 694-790 MHz ('700 MHz') frequency band in the EU for the provision of wireless broadband and other uses in support of EU spectrum policy objectives” of November 8th 2013



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possible. According to this, Cable Europe is looking forward to promote a follow up meeting with CEPT-ECC in order to better satisfy any doubt that might arise on the impacts foreseen.

Yours Sincerely

Cable Europe

A handwritten signature in dark ink, reading "Paulo Valente". The signature is written in a cursive style with a large initial 'P'.

Paulo Valente
Director of Technology