



European Radiocommunications Office



Organization for Security and Co-operation in Europe
Presence in Albania

Comments to the Draft Digital Television Broadcasting Development Strategy in the Republic of Albania

21 September 2004

Introduction

In a letter of 7 September 2004, the Deputy Chairman of the Albanian National Council of Radio and Television (NCRT), the national regulatory body for broadcasting, requested an OSCE Presence in Albania opinion on the Draft Digital Television Broadcasting Development Strategy in the Republic of Albania, prepared by the NCRT on 11 May 2004.

In response to this request, the OSCE Presence in Albania, in co-operation with the European Radiocommunications Office (ERO), has prepared joint remarks and proposals to the Draft Strategy. These practical suggestions keep in mind the efforts currently made in a wider European and international context with regard to transition into digital terrestrial broadcasting.

As the OSCE Representative on Freedom of the Media stressed in his letter to the Speaker of the Assembly of the Republic of Albania on 10 September 2004, digital terrestrial broadcasting is seen to be the future of the television broadcasting industry, but it is a new technology that is only beginning to be implemented in Europe. Therefore, it should be approached with caution and free from pressure. The OSCE Representative and the Presence, as well as ERO, consider this process to be very important for the future of the electronic media in Albania and for the process of the European integration of the country. In this light, it is vital that introduction of the digital terrestrial broadcasting comes after careful study.

General remarks:

1. From the first sight, it appears strange that Albania embarks on the strategy for immediate introduction of digital TV at the stage, when even the use of TV bands by analogue stations is not yet normalised. The fact that until now the TV bands in Albania are overcrowded with many TV stations, which broadcast in violation of the good radio engineering and spectrum management practices, suggests that the situation would become even more complicated after the introduction of digital TV.

2. While the undertaking of planning for digital TV and preparing the future plans is the plausible activity, this however should be approached without the pressure and hastiness of imposed introduction of digital TV immediately. Experiences in other countries of Western and Eastern Europe indicate that it may take some 5-10 years from starting the work on the plan and until the actual networks may be deployed.
3. It appears that the hidden, yet true driver for immediate introduction of digital TV in Albania is the wish to provide subscription-based TV services over the air, and this in itself is very natural and respectful wish, especially in situation when cable TV networks are not developed, hence radio-based networks may provide a viable option for quick build-up of necessary coverage. However such subscription-based TV distribution may be easily achieved using other radio technologies than the digital TV, for example by deploying the so called MMDS (Multi-channel Multi-point Distribution Service, sometimes also referred to as “wireless cable TV”). This system works in specially designated bands, i.e. outside the TV bands, therefore its deployment would not put any additional constraints on the existing analogue TV services and would allow a gradual implementation of digital TV in due time. This is described in more detail in the Proposals section below.

Remarks to particular points in the strategy paper:

1. The strategy talks of covering the territory of the republic, however in reality, the planning assumptions should be based on covering “population”, i.e. networks should be planned around cities, rather than providing coverage of all territory, which might unnecessarily include coverage of very scarcely populated areas;
2. The strategy refers to respect of “EU standards”, however EU does not have standards for technical planning of digital TV. Instead reference should be made to respecting “EU Policy papers and international agreements including International Telecommunications Union (ITU) provisions, as well as European Conference of Postal and Telecommunications Administrations (CEPT) documents and agreements”;
3. The strategy refers to the Chester agreement as the “basic document for standardising the planning of terrestrial digital broadcasting”, however that agreement was only a temporary milestone, which now becomes superseded by the activities on the revision of Stockholm-1961 agreement in the framework of ITU Regional Radiocommunications Conference (RRC), of which first session was held in 2004 and the final session will be held in 2006;
4. The strategy sets out the type of the network (SFN vs MFN) first, and then links it to national or regional level of deployment. In reality, the particular desired coverage of the network should be considered, which would in turn dictate what type of network should be used to achieve that coverage most efficiently. Also, the notion of dividable vs non-dividable networks is used inappropriately. The whole discussion of models for digital TV networks in section 4.4. is over-simplified;

5. Discussion of the achievable number of digital networks/programmes in section 4.6.1. appears unclear and the projected number of networks (21 at the national level) seems unrealistic. For comparison, the current planning exercises in other European countries are based on assumptions of achieving typically up to 6 and maximum 10 networks even for big countries like Germany;
6. It is not clearly described what kind of licensing procedure would be used (competition on merits, auctions?), while this is very critical and politically sensitive element;
7. The scenarios for transition to digital broadcasting in section 7 are apparently taken from the ITU documents that were prepared in the run up to the 2004 session of RRC. However there these scenarios were developed in the context of creating a new digital frequency plan, therefore they should not be put directly in the context of “digital conversion”. The latter is much more complex process involving many non-technical issues (legal, political, economic), which depend on the particular country but were thus left out of considerations;
8. There are some mistakes in the scenarios, like assumption that there would be no need for international agreements in scenario 1. Also, the list of items for consideration of the closing date for analogue TV in section 7.7. misses two of some of the most important points, notably the achieved coverage of digital TV and penetration of digital TV receivers in the consumers market;
9. As a remark applicable throughout the document, it may be suggested that the spectrum management aspects of digital TV plan should be de-coupled from the “programme-provisioning” considerations, as these are two different issues.

Proposals:

It might be recommended that the NCRT continue to work further on development of strategy for introduction of digital TV in Albania, and in doing so takes active part in the European planning activities. The time for planned introduction of digital TV should not be fixed at this time, and should become clear only upon completion of the planning.

Meanwhile, to relieve the pressure for provision of subscription-based TV distribution services, the following two alternatives may be considered:

1. To issue one or two test licences for Digital TV in Tirana and maybe a couple of other major conurbations. This may be justified by the need to test the equipment, gather real market experience, etc. However, for this exercise to be of reasonable proportions, the number of such trial licences and their coverage should be limited, so the question rises whether NCRT would be able to control the situation if the demand for new services would prove to be high. Duration of such test licences may be set either to something like 5 years, or “until the plan is completed and proper licences are issued”. In the latter case, it would be natural that the operators who had test licences would have got sufficient experience and market to compete and get the “proper” licences as well, so their initial investments would not be lost.

2. Another viable, affordable and technically sound option would be to issue licences for provision of subscription-based TV distribution services using the MMDS technology, e.g. in the 2500-2690 MHz band. MMDS networks in that band were deployed very widely in Americas (notably in the USA) and since early 1990-ies in many Eastern European, but even in a few Western European countries. Such wide deployment means that the equipment prices should be sufficiently low and the level of provided services is satisfactory. Typically such networks allows secure (scrambled analogue or digital) distribution of some 24 TV channels to many subscribers. The 2.5 GHz frequency band would be ideally suited to the Albanian practices of serving cities from the tops of the nearby mountains, as there would be good possibilities for direct line of sight to the base station. Since recently, manufacturers also offer MMDS equipment with a dedicated return channel, which allows provision of interactive services like Internet browsing. Also other bands than the aforementioned 2.5 GHz band may be used for MMDS-like services, although equipment prices should be somewhat higher in those other bands. It should be mentioned that the band 2500-2690 MHz is earmarked in Europe for future extension of 3G/UMTS mobile telecommunications networks, however UMTS networks have other primary bands to develop initially, so it may be suggested that the 2.5 GHz band may be used in Albania for MMDS in short to medium term (5-10 years), e.g. until the digital TV has been planned and developed properly or until the subscriber base and their purchasing capacity have evolved to justify deployment of wireless access and TV distribution networks in higher frequency bands (e.g. 3.5 GHz, 10 GHz, 26 GHz).

It may be also noted that both of these options might be exercised even in parallel, if the demand for operating subscription-based TV distribution networks proves to be high.