

# Intel Corporation Response to the Digital Britain Interim Report

**March 2009**

Intel would like to thank you for the opportunity to offer feedback on the Digital Britain Interim Report. Our overall impression of the report is that it is aggressive in terms of timescales and in general well thought through.

## ***About Intel Corporation - Our interest in the Digital Britain Report***

Intel has for many years focused its research on pursuing technologies that create an environment whereby the user can be connected any place, any time. Our overriding impression of the report is that Intel is working hard to achieve many of the same mid- and long-term goals as the report calls out. For example we are currently working with Government on a number of relevant initiatives such as Digital Inclusion.

That said, in general we believe the report does not include enough emphasis on new technologies and services. In addition we would like to highlight the most urgent item to work on is to ensure there is no further delay to the forthcoming 2.6GHz spectrum auction. If Britain is to create a real showcase of mobile broadband for the Olympics then any infrastructure must be in place by the middle of 2010. An auction delay beyond June of this year will put in real jeopardy the commercial creation of a wireless network capable of true mobile broadband in time for the Olympics.

## ***Key points from Intel Corporation***

### **1. Technology**

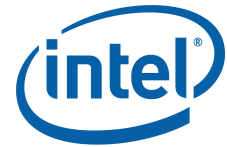
Intel recommends the report should have more emphasis on new and developing technologies other than the existing infrastructures such as 2G and 3G. Intel recommends a more forward looking analysis such as defining a framework policy to accelerate the enabling of new technology neutral initiatives. We note the mention of LTE throughout the report whereas there is no mention of WiMAX. We recommend that in the spirit of technology neutrality, neither of these technologies should be called out specifically in the report.

### **2. Broadband speed**

The report sets a goal of "up to 2Mb/s". Whilst we appreciate government cannot regulate quality of service, Intel believes that the term "up to" will not enable a broadband infrastructure that will be universally acceptable to all users. We recommend 2 Mb/s should be the minimum objective however that this doesn't necessarily mean it should be mandated in all instances.

### **3. Timescales**

Intel believes there is too much focus on fixed broadband within the report. We do not believe the proposed timescales can be met without a stronger emphasis on mobile wireless technologies. For example we believe that mobile wireless can provide a path for broadband deployment at the 2012 Olympics. We further believe it is necessary to release 2.6 GHz and digital dividend spectrum within 2009 if possible and also to enable GSM re-farming within a similar timescale.



#### **4. New services**

Intel endorses Action 7 within the report. We agree completely that digital TV does require a return path capability as a priority. This will enable new services such as digital health and education thereby improving the efficiencies in the provision of these services.

#### **5. Digital inclusion**

Intel is aware that the government has a desire to deploy in rural areas. The report will need to focus on more incentives for operators to make this investment. In this context we see incentives as being opportunities that are a win-win for the Government, the Operator and the consumer. Such incentives do not necessarily need to be cash incentives.

#### **6. Content**

Intel has provided responses to the Peer to Peer consultation and the Copyright the Future consultation. As stated in those consultations, Intel believes that market forces and private agreements, not Government mandates, are the best option to foster the development of new consumer offerings, new usage models, and protection of the digital content owner's interests, including addressing concerns related to illicit P2P file sharing. Nevertheless, if legislation is deemed appropriate such legislation should ensure that it protects not only rights holders but also consumer interests and provides safe harbors for ISPs when complying with the law.

Intel believes the burden of finding an alleged infringement should fall to rights holders. Intel does not believe ISPs should be forced to spy on consumers. Intel believes that private agreements, not Government mandates, best allocate the costs of such consumer monitoring and are best left to the parties involved in the agreements. Courts, not ISPs or others, should make ultimate copyright infringement determinations based on evidence presented by rights holders. Moreover, ISPs should only provide private consumer information at the request and under the supervision of a Court.

Legislation should clearly set forth the standard of proof required of rights holders for an infringement determination; the ISP obligation to notify its customer, remove allegedly infringing materials, collect and retain confidential customer information to provide upon issuance of a court order; and, ISP safe harbor for following the requirements.

Thank you for giving Intel the opportunity to comment on this report. We would like to be involved in the next stage of the report, particularly in the areas we have noted above. We thereby offer our services to the further development of actions: 1, 2, 3, 4, 5, 6, 7, 10-16 and 19 as these seem the actions most aligned to our commentary.

#### **About Intel**

For decades, Intel Corporation has developed technology enabling the computer and Internet revolution that has changed the world. Founded in 1968 to build semiconductor memory products, Intel introduced the world's first microprocessor in 1971. Today, Intel the world's largest chip maker is also a leading manufacturer of computer, networking, and communications products. For more information see <http://www.intel.com>