

Radio Spectrum Policy Group – Secretariat  
 DG CNECT B4: Spectrum – Office: BU33 7/065  
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**Response to the Public consultation on the Draft RSPG Second Opinion on 5G networks.**

Dear Sirs,

Please find enclosed a response to the consultation on the DRAFT RSPG Second Opinion on 5G networks from Broadcast Networks Europe (BNE).

Yours sincerely





















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**BNE - 18 members operating in 21 countries**

BNE is trade organisation for Terrestrial Broadcast Network Operators for Radio and TV in Europe based in Brussels

|  |  |  |   |   |   |   |
|--|--|--|---|---|---|---|
| <br>Hungary     | <br>UK      | <br>Spain | <br>Czech Republic | <br>Greece                     |   |   |
| <br>Poland      | <br>Serbia  | <br>Italy | <br>Germany        | <br>Norway,<br>Belgium         | <br>Croatia          | <br>Austria |
| <br>Switzerland | <br>Romania | <br>Italy | <br>Ireland        | <br>France, Estonia,<br>Monaco | <br>Sweden, Denmark |   |



## **Consultation response - Draft RSPG Second Opinion on 5G networks**

Broadcast Networks Europe (BNE) welcomes the opportunity to provide feedback on the Second RSPG Opinion on 5G networks and express its willingness to collaborate and discuss with RSPG on this and all related issues.

BNE notes the second item of the RSPG's opinion stating that

*"The RSPG is of the opinion that the Commission, together with Member States, should take actions to fully support 5G related policy objectives in rural areas and wide coverage, taking into account the role of satellite in achieving ubiquitous connectivity."*

BNE comments are focused on the use of the sub 1GHz band as a means to provide affordable rural areas and indoor coverage as noted in section "A2.4.2 - 5G coverage challenges".

Consistent with the RSPG 1<sup>st</sup> opinion on 5G, BNE wishes to emphasize that the 470-694 MHz band must not to be considered in any respect for 5G, even for the long term. There is a well-established consensus<sup>1</sup> that the 470-694 MHz band is *the* core band for terrestrial broadcasting services both in Europe and further afield, and will remain so for the foreseeable future.

The RSPG has previously (and correctly) pointed out that Europe is leading the world in terms of releasing spectrum below 1GHz for wireless broadband within a 2020 timeframe. This is represented by the availability of the 700 MHz, 800 MHz and 900 MHz bands<sup>2</sup>. Therefore, the solution, in order to improve coverage, must ideally come from promoting the optimal use of the 694-960 MHz resource for 5G. This may require exploring new and innovative approaches in the band plan designs<sup>3</sup>.

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<sup>1</sup> As expressed in many instances such as in the RSPG opinion on a long-term strategy on the UHF Band, in the Lamy Report, at WRC-15, and in the Decision (EU) 2017/899 of the European Parliament and of the Council on the use of the 470-790 MHz frequency band in the union.

<sup>2</sup> cf RSPG comparison table in [RSPG 16-006](#) page 70.

<sup>3</sup> Such as the one explored by Aetha Consulting for Digital UK in the [Defragmentation Dividend](#).