

Radio Spectrum Policy Group – Secretariat  
DG CNECT B4: Spectrum – Office: BU33 7/065  
European Commission, B-1049 Brussels, Belgium

E-mail: [CNECT-RSPG@ec.europa.eu](mailto:CNECT-RSPG@ec.europa.eu)

## Response to the Public consultation on the Draft RSPG Work Programme for 2018 and beyond.

Dear Sirs,

Please find enclosed a response to the consultation on the Draft RSPG Work Programme for 2018 and beyond from Broadcast Networks Europe (BNE).

Yours sincerely



Lars Backlund  
Secretary General, Broadcast Networks Europe

E-mail: [lars.backlund@broadcast-networks.eu](mailto:lars.backlund@broadcast-networks.eu)

Mobile: +46 708 742123

### 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

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



 BNE Member

## **Consultation response - Draft RSPG Work Programme**

Broadcast Networks Europe (BNE) welcomes the opportunity to provide feedback on the Draft RSPG Work Programme for 2018 and beyond and express its availability to collaborate and discuss with RSPG on all related issues.

Following, find BNE views and comments on two of RSPG work items.

### **Common Policy objectives for WRC-19**

Early harmonisation measures gives industry the certainty to invest and innovate. From this point of view, BNE recognises the importance of the ongoing work of the RSPG and, accordingly, all three proposed activities seem reasonable and will help with the preparation process for WRC-19.

When defining common policy objectives for WRC-19, BNE emphasizes that no discussions on the sub-700MHz band should take place at WRC-19. This is consistent with Resolution 235 which addresses the review of Region 1 spectrum use in the frequency range 470-960 MHz and resolves to invite ITU-R to discuss this matter at WRC-23 as follows:

1. to review the spectrum use, and study the spectrum needs of existing services within the frequency band 470-960 MHz in Region 1, in particular the spectrum requirements of the broadcasting and mobile, except aeronautical mobile, services, taking into account the relevant ITU Radiocommunication Sector (ITU-R) studies, Recommendations and Reports;
2. to carry out sharing and compatibility studies, as appropriate, in the frequency band 470-694 MHz in Region 1 between the broadcasting and mobile, except aeronautical mobile, services, taking into account relevant ITU-R studies, Recommendations and Reports;
3. to conduct sharing and compatibility studies, as appropriate, in order to provide relevant protection of systems of other existing services,

Resolution 235 also resolves to invite the WRC-23 to consider, based on the results of studies above and provided that these studies are completed and approved by ITU-R, possible regulatory actions in the frequency band 470-694 MHz in Region 1, as appropriate.

Parallel to this, the European Union, in its 2017 UHF Decision, has also made it clear that Member States must act consistent with the provisions of the UHF Decision in matters relating to WRCs.

Therefore, any RSPG recommendation to the European Commission on common policy objectives should fully reflect the resolutions taken during the WRC-15. In the case of Resolution 235 those recommendations should seek to ensure the availability, until at least until 2030, of the sub-700MHz band for the terrestrial provision of broadcasting services.

### **European Spectrum Strategy**

BNE fully agrees with the proposed approach as we believe that citizens are primarily concerned with receiving a plurality of diverse media provision, irrespective of the technical means by which this is delivered.

There is a clear need to take into account the broader picture when deciding on how best to allocate frequencies in Europe. This involves policy-makers taking a holistic approach supported by a strong common vision and commitments which points to win-win solutions.

BNE welcomes the RSPG statement that spectrum management “should take into account not only technical parameters but also economic, political, social, cultural and other strategic considerations”. We further agree that this will increase the welfare of the citizens while creating better societies to live in.

Such an approach was followed recently, for example, during the discussions on the future use of the UHF spectrum in Europe, which resulted in a clear European position at WRC-15 and the EU decision on the UHF band in 2017.

When it comes to terrestrial broadcasting spectrum allocations, there needs to be recognition that 250 million Europeans choose television via the digital terrestrial television (DTT) broadcasting platforms. This represents a preferred means of media consumption. Moreover, 80% of the EU population listens to the radio for 2 to 3 hours a day, mostly through broadcasting (analogue and digital). Television and radio are the most intimate and trusted means of fostering national identities. DTT, at the heart for TV and radio provision upholds Europe's unique, comprehensive and virtuous audio-visual model. This model, with the associated benefits for the production sector, is an engine for jobs and growth creation in all European countries, preserving cultural diversity.

As Europe's terrestrial broadcast industry enjoys significant scale and can therefore invest in high quality cultural and creative works, its benefits are recognised in European law as an integral part of general interest and public policy objectives.

For many European countries, the absence of terrestrial broadcasting would significantly weaken these general interest objectives, undermining broader national media industries with a negative impact on growth and employment.

Based on the aims of the recent EU UHF decision recognising the complex transition to adapt to the 30% reduction of spectrum available for DTT after clearance of the 700 MHz band, BNE is of the opinion that there is no scope for RSPG in readdressing the issue of the long-term use of the 470-694 MHz band in the upcoming work program.