



7th January 2023

Confindustria Radio Televisioni response to the public consultation on the Draft Report on Mobile technology evolution

Confindustria Radio Televisioni (CRTV) is the association of Italian public and commercial radio and television broadcasters.

Established in June 2013, CRTV includes among its members: Discovery Italia, Elemedia (GEDI), GMH, La7, Mediaset, Persidera, Prima Tv, Qvc Italia, Radio Italia, CN Media, RAI Radiotelevisione Italiana, Gruppo 24Ore, RDS – Radio Dimensione Suono, Rete Blu, RTL 102,500 Hit Radio, Sportcast, Tivù, Viacom International Media Network Italia, E! Towers. Satellite operator Eutelsat Italy is an aggregated member. Major local TV and radio broadcasters are represented in CRTV through the Association of Local Televisions and the Association of Local Radios FRT.

The sector has overall revenue of about 9,8 billion euros and a workforce of approximately 90,000 employees, of which about 30,000 direct (CRTV estimates).

CRTV's goal is to represent the broadcasting industry as a whole at the institutional, legislative and contractual levels.

CRTV collaborates with all competent Ministries, Political Institutions, and Regulators, both at national and EU level. The Association's activities are

BROADCASTER TV:

Discovery Italia Srl
Gmh Spa
La7 Spa
Mediaset Spa
Qvc Spa
Rai Spa
Rete Blu Spa
Sportcast Srl
Viacom International
Media Network Italia Srl

RADIO NAZIONALI:

Cn Media Srl
Elemedia Spa
Gruppo Sole24 ore
Radio Dimensione
Suono Spa
RadioMediaset Spa
Radio Italia Spa
Rai Spa
RTL 102,500 Hit Radio Srl

EMITTENZA LOCALE:

Associazione Tv
Locali
Associazione Radio
FRT

PIATTAFORME

SATELLITARI:

Eutelsat SA
Tivu Srl

OPERATORI DI

RETE:

E! Towers Spa
Elettronica
Industriale Spa
Persidera Spa
Prima Tv Spa
Rai Way Spa

PARTECIPAZIONI IN:

Confindustria
Auditel
IAP
AER
Eurovisioni
Osservatorio TuttiMedia
ITU - International
Telecommunication
Union

aimed at contributing to the creation and maintenance of fair rules that allow the sector to grow, innovate and continue to play its important role in the modernization process of the country.

Technology neutrality and 2G/3G phasing out

It is essential to continue to pursue technology neutrality for all services including Emergency Services and eCalls, in order to guarantee the most efficient use of the radioelectric spectrum. At the same time the regulatory framework should help new technologies evolution setting the phasing out of older ones which do not use any more the spectrum in an efficient manner.

The request of additional frequency for IMT services would be illogical if the spectrum already assigned is used in an inefficient manner.

It would therefore be most appropriate for all member states to adopt a migration plan for the phasing out of 2G and 3G technology.

Commission delegated regulation of 16 December 2022 supplementing Directive (EU) 2018/1972 of the European Parliament and of the Council with measures to ensure effective access to emergency services through emergency communications to the single European emergency number '112' goes in this direction. It would also be appropriate to review the eCall Regulation (EU) 2015/758 to overcome the existing limits and make the emergency protocol in standards mandatory for VoWiFi (Voice over WiFi) and VoLTE calls.

A definite time horizon phasing out is necessary also considering the difficulties to maintain 2G and 3G beyond the decade as the availability of spare parts might not be adequate by then.

Competitive aspects

Not all mobile network operators were on the market when 2G/3G were the only technologies in use. Maintaining 2G/3G networks for a long time for services provided only by incumbent operators may determine an anti-competitive situation.

Emergency Calls and eCalls

It is essential to move on a technology neutrality approach also for Emergency Calls and eCalls.

Adopting outdated mandatory technology for eCall services now makes it extremely difficult to move away from the old technologies as far as an emergency service is concerned.

The question is: why a new service such as eCalls was introduced on production cars starting from 2018 based on obsolete technology.

The only solution now is to reserve for an adequate timeframe a small portion of the 2G band for eCall emergency services only. No other services should remain on 2G-3G networks after a certain date to be defined at EU level.

For more information, please contact CRTV
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