



**21<sup>st</sup> August 2023**

**TO: [CNECT-RSPG@ec.europa.eu](mailto:CNECT-RSPG@ec.europa.eu)**

**Confindustria Radio Televisioni response to the Public  
Consultation on the Draft RSPG Opinion on  
The development of 6G and possible implications for spectrum  
needs and guidance on the rollout of future wireless broadband  
networks**

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, EI 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,

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**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:**  
EI 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

both at national and EU level. The Association's activities are 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.

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It is essential to pursue technology neutrality for all services 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 mobile services - with specific reference to frequencies below 1 GHz - would be illogical if the spectrum already assigned is used in an inefficient manner.

With reference to the process to deliver 700 MHz Wireless Broad Band WBB authorizations, it should be noted that in the Italian 5G auction the 3 SDL slots (738-743, 743-748, 748-753 MHz) remained unassigned due to participants' lack of interest. This happened also in other Member States.

It is worth noting also that no flexible national use for Public Protection and Disaster Relief (PPDR), Programme Making Special Events (PMSE) or Internet of Things (IoT) has been implemented in 700 MHz band even if this has been provided in Decision (EU) 2016/687.

This is one of the aspects that need to be carefully analysed to review appropriately the Recommendations to Commission and Member States: the effective use of the spectrum already allocated to a service.

Another aspect is related to any request for new spectrum allocation for frequencies below 1 GHz. This request needs to be accompanied by a careful assessment of the correct use of the already assigned spectrum. No other spectrum below 1 GHz should be assigned to services that can be reorganize with an improvement of efficiency.

While a further reduction beneath 694 MHz of the broadcasting spectrum for mobile would endanger the survival of this technology beyond 2030, at the same time the benefits for mobile applications are modest and a better use and reorganisation of 694-960 MHz bands would better fit the purpose.

The requirements of the mobile sector are changing, and this will be even more true after

2030. The mobile sector is requiring large contiguous blocks of spectrum and there will be limited demand for further assignments of 2x5 or 2x10 MHz as previously happened for 800 and 700 band. Therefore, the real need of the mobile sector is not a new allocation, but a better use of existing allocated frequencies.

Moreover the mobile sector's storytelling refers to sub-700 MHz band for connectivity "*covering also sparsely populated areas and reaching "deep-indoor"*"<sup>1</sup>. This was the same claim used for 700 MHz and 800 MHz band allocation to IMT applications. 700 MHz and 800 MHz bands are more than sufficient to cover these needs, also without any new allocation.

To similar conclusions the result of the White paper on behalf of Digital UK<sup>2</sup> that proposes to create a "*defragmentation dividend*" by reconfiguring 694-960 MHz band to make additional capacity available to mobile services instead requesting the broadcasting band 470-694 MHz disposal.

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<sup>1</sup> "Spectrum, inclusion and sustainability: why WRC-23 matters" - By Xhoana SHEHU, Policy Manager, ETNO – July 2023

<sup>2</sup> White paper on behalf of Digital UK - November 2017 AETHA "The defragmentation dividend - A more efficient use of the UHF band".