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**ARD/ZDF Comments on the
Draft RSPG Work Programme for 2011**
(RSPG10-346-Draft Rev 2 - 13 December 2010)

14 January 2011

Introduction

ARD and ZDF welcome the opportunity to comment on the Draft RSPG Work Programme for 2011.

ARD and ZDF are the Public Service Broadcasters in Germany using extensively the broadcasting bands for the terrestrial distribution of their programmes.

ARD and ZDF support the activities of the RSPG to provide an overview of the upcoming items and key aspects to be dealt with in the next year.

General Remarks

Free to air broadcasting is an attractive, modern, high-quality and future proof manner to distribute our high-quality content and - due to our service obligations - is crucial for German Public Service Broadcasters. Hence our intention is to stress that not only economically measurable criteria are relevant but also aspects to assure democracy, cultural diversity, media pluralism and last but not least free expression of opinion.

Review of Spectrum Use

We support the drafting of an RSPG opinion on "the best process for analysing spectrum demand and the impact of technology trends on such demand". As already stated above we would like to draw attention on the fact that socio-economic issues have to be taken duly into account.

Improving Broadband Coverage

High-speed wireless broadband access is a key driver for economic development in Europe. With respect to broadcasting there are clear indications for an intensified usage of hybrid broadcast/broadband networks within the next years. Nevertheless we perceive that future capacity and development needs with respect to other important radio services like terrestrial TV broadcasting are somewhat underestimated.

Spectrum sharing and joint RSPG-BEREC work programme

One of the work outlines is intended to further explore the way in which the economic value of spectrum is determined via identifying best practices. As mentioned above an appropriate approach is to account for non-monetary values in order not to jeopardize the long-term future of broadcasting for short-term profit.

Subjects for Review and Development over the period 2011-2012 (proposal)

ARD and ZDF appreciate that the RSPG recognizes the necessity to foster the development of Digital Radio Broadcasting. Even though broadcasting was included in the revised Telecom package there is still a need for thorough investigation and guidance how to stimulate a European wide digitization of radio in order to assure that pan-European services and usability are possible in a pan-European market. A more detailed inclusion of this topic into the RSPG work programme would be very helpful. There are several fields of beneficial activities concerning audio broadcasting like stipulating standardised receivers and adequate immunity to interference in order to safeguard future investments and business models.

Though there were some very welcome activities within the RSPG related to future spectrum demand of PMSE, we miss further actions in order to encourage additional steps to alleviate spectrum scarcity of these applications. Therefore we would like to suggest adding some measures like investigating technological improvements, identification of alternative spectrum and prevention of harmful interference to PMSE to the work programme in 2011 - 2012.