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**Response by ARD and ZDF to the Consultation on the RSPG Opinion  
on the ITU-R World Radiocommunications Conference 2019**

ARD and ZDF welcome the opportunity to comment on the draft RSPG opinion on the ITU-R World Radiocommunications Conference 2019.

Broadcasters need a reliable and stable environment when it comes to spectrum allocation. This is a prerequisite to a continued offer of innovative and highly qualitative broadcasting services and to develop and introduce new future proof broadcasting technologies that enable both, stationary and mobile TV reception. This is also essential for public service broadcasters to fulfill their public service remit. The permanent availability of sufficient spectrum with broadcasting allocation is central to this.

With respect to the Agenda Items for WRC-2019, ARD and ZDF have a special focus on AI8 and AI10.

WRC-2019 AI8

ARD and ZDF note that the RSPG opinion does currently not address WRC-2019 AI8. Therefore, ARD and ZDF propose that the RSPG opinion is complemented accordingly. We hold the view that in general the number of footnotes and of countries named in footnotes should be reduced. In any case, the list should not be extended. This requirement helps to preserve the existing level of harmonization of the broadcasting band 470-694MHz. Therefore, we propose as an EU position for WRC-2019 that no footnotes will be introduced that deviate from the broadcasting allocation in Region 1 and that existing footnotes are not extended in a way that further limits the broadcasting allocation in Regions 2 and 3. Given the importance of a harmonized 470-694MHz band for broadcasting use, the proposed EU position should be classified at least as a "case b)" recommendation.

WRC-2019 AI10

Regarding AI10 "Preliminary Agenda for WRC-2023" ARD and ZDF support the current draft EU position on the preliminary WRC-2023 AI2.5, stating that this item - in accordance with Resolutions 235 (WRC-2015) - will only be dealt with at WRC-2023 after a study period following WRC-2019. Any attempts to bring this topic forward already at WRC-2019 should strictly be refused by the EU and its member states. EU policy makers have recognized the unique role DTT plays for serving citizens in article 4 of the *EU Decision 2017/899 on the use of the 470-790 MHz frequency band in the Union*, according to which Member States shall ensure the availability at least until 2030 of the 470-694MHz frequency band for the terrestrial provision of broadcasting services and for the use by wireless PMSE. Thus, ARD and ZDF would encourage the RSPG in view of an EU position to clearly state that deviations from the Agenda for WRC2019 are to be refused by the EU.