

20.07.2018

EBU Response to the (DRAFT) RSPG Opinion on the ITU-R World Radiocommunication Conference 2019

The EBU¹ welcomes the opportunity to comment on the (DRAFT) RSPG Opinion on the ITU-R World Radiocommunication Conference 2019 (WRC-19).

Broadly, the EBU supports the draft RSPG Opinion, the agenda items identified as being covered by EU policies and, for each of them, the recommendation of the appropriate course of action to be proposed by the European Commission for adoption by the Council. The EBU, however, provides below comments on certain points.

General issues

In Section 4.1 “General Objectives”, the RSPG identifies that some countries may try to introduce proposals to WRC-19 which fall outside the scope of its agreed Agenda. This possibility has already been identified by other observers as requiring particular attention as while the ECJ judgment is clear that EU Member States must act in concert at WRCs, there has been no consideration given to how such coordination would take place in practice. This draft Opinion would have been an opportunity for RSPG to propose a mechanism for dealing with the unexpected occurrences which happen at all WRCs. Instead, only one proposal is made in this Opinion relating to Agenda Item 1.13, the 27.5-28.5 GHz band.

Specific WRC-19 agenda items

Broadcasting services would appear not to be impacted by the WRC-19 agenda, which does not include any item dealing directly with a band allocated and currently used by broadcasting services.

However, there are several agenda items that relate to frequency bands adjacent to broadcasting services as for example 1.3 (secondary allocation to the meteorological-satellite service), 1.7 (non-GSO satellites sort duration) and 9.1.6 (Wireless Power Transmission (WPT) for electric vehicles). EBU has contributed to sharing studies to define criteria or relevant mitigation techniques that would protect broadcasting.

We note the important role of European regulators to put in place adequate measures to be implemented by the industry, reflecting the criteria and mitigation solutions resulting from WRCs studies in order to protect other services, including broadcasting, while at the same time allowing further spectrum sharing and co-existence between services and/or systems.

¹ The European Broadcasting Union (EBU) is the world's leading alliance of public service media (PSM). We have 73 Members in 56 countries in Europe, and an additional 33 Associates in Asia, Africa, Australasia and the Americas. Our Members operate almost 2,000 television, radio and online channels and services, and offer a wealth of content across other platforms. Together they reach an audience of more than one billion people around the world, broadcasting in more than 120 languages. The EBU operates Eurovision and Euroradio services.

In particular, on **Agenda Item 9.1.6**, preparatory studies undertaken in ITU-R show the clear potential of Wireless Power Transfer (WPT) devices to interfere with reception of Low Frequency (LF) and Medium Frequency (MF) radio broadcasting, due to the high levels of unwanted emissions from WPT systems. In some Member States, these bands remain a critical part of the public service broadcasting distribution infrastructure, and often provide the only broadcasting service capable of reaching remote communities. They are also used effectively in many countries for community radios with local coverage areas. Specific changes in the Radio Regulations may not be needed by WRC-19 on this issue. However, the importance of collaboration between ITU and Standard Developing Organisations (SDO) needs to be emphasized, with a clear role given to ITU in specifying the protection requirements of Radio services. The EBU regrets that Agenda Item 9.1.6 is not considered in the draft RSPG Opinion.

We also note that **Agenda Item 8** is not mentioned in the draft Opinion. The RSPG should affirm that it will support the provisions of Resolution 26 (Rev. WRC-07) and only permit the deletion of countries from existing footnotes to the Radio Regulations, or the removal of entire footnotes. The addition of country names to existing footnotes is, as a general rule, out of scope of the Agenda item and of the provisions of Resolution 26, and the RSPG should, on the grounds of protecting European interests in all bands, resist attempts to do so. Furthermore the proposals for the addition of new country footnotes which are not related to agenda items of this Conference should not be considered.

The EBU supports the inclusion, under **Agenda Item 10**, of consideration of the spectrum used, and needs of, existing services in the band 470-960 MHz at WRC-23, as drafted in Resolution 235 at WRC-15. This might be the right time to talk about the future use of the UHF band, but not before.

The UHF band (470-694 MHz) is the unique worldwide harmonised band for DTT, the backbone of free-to-air services in Europe with over 250 million viewers, 2000 TV channels and 300 million receivers in the market. DTT is continuously evolving towards most efficient and innovative technologies (DVB-T2, MPEG4/HEVC, HbbTV) and will remain crucial in many EU countries until at least 2030. The band is also unique for most PMSE services which play a crucial role in European content production and largely contribute to the creative and cultural sector's economy and jobs.

EU policy makers have recognized these two unique roles. According to Article 4 of the EU Decision 2017/899 *on the use of the 470-790 MHz frequency band in the Union*,² Member States shall **ensure availability at least until 2030** of the 470-694 MHz frequency band for the terrestrial provision of broadcasting services and for use by wireless audio PMSE.

This WRC-23 agenda item should allow for administrations and the media industry to find solutions that will satisfy different national needs and provide enough flexibility for the future use of the band while ensuring continued availability to meet DTT and PMSE requirements.

² <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32017D0899>