RTÉ Response to the Radio Spectrum Policy Group draft opinion on the ITU-R World Radiocommunication Conference 2023.

RTÉ is the national public service broadcaster in Ireland. We provide trusted public service media through a range of platforms to maximise reach and accessibility.

RTÉ is pleased to have the opportunity to contribute to this consultation and to inform the RSPG's advice to the European Commission on these important issues, one of which (Agenda item 1.5 / UHF Review) will have central influence on the future availability of public service media in Europe. RTÉ also supports the EBU response to this draft RSPG opinion.

In Ireland, RTÉ's digital terrestrial TV platform Saorview is a vital source of free to air public service media. It is available to over 98% of households in Ireland (and approximately 75% of households in Northern Ireland) delivering reliable and secure access to trusted Irish public service media including important cultural and Irish language services. Up to 37% of households nationally [source: TAM Ireland/Nielsen, July 2022] currently rely on Saorview for access to Irish free to air public service television. In some regions - predominantly rural - this figure includes up to 57% of households. The Saorview platform is continuing to grow with the addition of new services (the number of TV services increased by 9% in 2021 and we expect to further increase this in 2022 and 2023). RTÉ expects digital terrestrial TV to remain an important platform for a significant proportion of Irish citizens well into the 2030's.

In addition to RTÉ, outside broadcast companies, content creators and events producers in Ireland also rely heavily on the remaining UHF spectrum for programme making and special events (PMSE). Wireless microphones and talk-back/monitors operating in the UHF band are now integral to modern production and there are no practical near-term alternatives for elements of this key enabling technology.

WRC-23 Agenda Item 1.5 - "No Change"

RTÉ urges the RSPG to recommend "No Change" for WRC-23 AI-1.5. Furthermore, sub-700MHz spectrum should not be reviewed again prior to WRC-31 to ensure that the regulatory certainty intended and agreed by the UHF Decision is delivered. Broadcasting needs long term certainty to continue investment cycles, and to continue to develop.

The remaining UHF spectrum is required for Digital Terrestrial Television in Ireland well into the 2030's and probably beyond. DTT provides secure and robust public service media and information to Irish households. As a one-to-many TV media delivery platform DTT is environmentally efficient, and produces significantly reduced carbon footprint than alternative platforms [ref. The LoCat

Project, Sept. 2021]. As such, this platform fulfils an important role in offering a choice to Irish TV viewers in how they access public service media.

The role of UHF spectrum is vital in modern programme making, and continues to grow, sharing spectrum in harmony with DTT. Wireless microphones, in-ear monitors, and talk-back systems are essential in live broadcasting, TV & Radio production, film making, corporate events and the wider entertainment sector. We have seen these demands grow year on year as production trends have moved to an 'everything wireless' model. This spectrum is essential to enable member states to host major sporting and cultural events and to continue to facilitate international shows and entertainment acts visiting this country. There are currently no near-term alternatives to meet the demanding requirements of multi-channel professional audio in programme production.

Sharing between Broadcasting/PMSE and Mobile is not practical due to their incompatibility and resulting risk of interference; even over large distances and between neighboring countries. We believe that the promise of flexibility from a co-primary allocation with Mobile is misleading. Given that sharing between Broadcasting and Mobile is not practical, an additional primary allocation for Mobile is likely to result in further - and even complete - loss of spectrum for Broadcasting and PMSE. At the very least, the plausible threat of a future change of use would stifle further investment and innovation in terrestrial broadcasting. A sufficient degree of flexibility already exists within the existing spectrum frameworks to allow member states to make some alternative use of the remaining broadcast UHF spectrum without impacting broadcasting in neighboring countries.

There should be no proposal to implement a co-primary allocation on a deferred basis. We believe that such a proposal would have a similar negative impact on the Irish broadcast industry as a direct and immediate co-primary allocation, and is not in the spirit of the EU UHF decision [2017/899]. A deferred implementation should only be considered where there are existing legacy services which have a known end of use date.

More low band spectrum for Mobile - at the expense of Broadcasting - is the wrong strategy to address localised mobile network capacity problems and rural coverage expansion. The impact of the rollout of networks in the 700MHz band is yet to be fully realised in Europe, as is the migration to more efficient 4G and 5G technologies in other well established mobile bands. Beyond this, greater use of mid-band spectrum in areas needing high capacity and further network infrastructure investment to address rural coverage must be incentivised prior to seeking more low-band spectrum.