LATVIA STATE
RADIO AND TELEVISION CENTER

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Radio Spectrum Policy Group

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Latvian State Radio and Television Centre LVRTC welcomes the opportunity to comment on the Radio Spectrum Policy Group DRAFT Opinion on the ITU-R World Radiocommunication Conference 2023.
Our response addresses the preparation of the European Union position regarding the agenda item 1.5 of WRC on the use of the UHF Band and possible regulatory changes in the 470-694 MHz band.
State Owned Joint Stock company “Latvian State Radio and Television Centre (LVRTC) calls for the preservation of this frequency band for the needs of terrestrial television broadcasting in the Republic of Latvia in the name of national interests and for the needs of comprehensive public information not only until the period specified in Article 4 of the European Parliament and Council Decision (EU) 2017/899 (May 17, 2017) (i.e. at least until 2030 .), but also after 2030.
This would enable LVRTC to continue providing television broadcasting in full throughout the territory of Latvia, taking into account the trends in television content consumption and the technological means available to households for consuming TV content (i.e. models of used devices, especially within the senior segment). Still, a significant part of households in the Republic of Latvia use television directly in the terrestrial broadcast format (both free and paid), which can be explained by the shortcomings of other platforms - the complexity of using interactive television for the elderly, the need to invest in new devices to use streaming services, the unavailability of other free TV content providers, etc.

Hereby we would like also to underline that in 2021 significant investments have been made by the LVRTC in the renovation of the infrastructure of the television broadcasting head station with the aim of ensuring high-quality terrestrial television broadcasting in the 470-694 MHz band in both free and paid segments. The actual service life of this type of fixed assets is at least 15 years, which indicates the possibility of providing terrestrial TV broadcasting at least until 2036, using the new broadcasting infrastructure. The Latvian Digital Terrestrial TV infrastructure is very important with Free program coverage available in 99.77% of the country and to 99.87% of the population, and Paid TV programs are available in 94% of the country. This has also become matter of national security after Russian invasion in Ukraine 24.02.2022.

About LVRTC
Latvian State Radio and Television Centre LVRTC is a provider of electronic communication services primarily selected by the state and operators to offer new opportunities for the Latvian information society. We develop and maintain an open, reliable, and sustainable electronic communications environment to ensure that all residents of Latvia are informed, free and independent in their decision making.
Regarding Broadcasting, we are the main national operator of the terrestrial broadcasting network for radio and television programs.
LVRTC is a 100% state owned company.

Chairman of the board Ģirts Ozols

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