TELECENTRAS

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RESPONSE TO RSPG DRAFT OPINION

Lithuanian Radio and Television Centre LRTC/TELECENTRAS welcomes the opportunity to comment on the Radio Spectrum Policy Group DRAFT Opinion on the ITU-R World Radiocommunication Conference 2023.

About LRTC/TELECENTRAS

Lithuanian Radio and Television Centre or LRTC for short, also known as Telecentras, provides radio and TV programs broadcasting to all residents of Lithuania, as well as providing data center services for state institutions, network connection and colocation services for mobile operators. The company has implemented system for extreme situation warning which can immediately insert video and audio messages of responsible public safety institutions into national digital terrestrial TV and radio programs. The Company is included in to list of strategically important Lithuanian companies and owns the highest building in the country: Vilnius TV Tower (326.5 m).

LRTC/Telecentras is a state-owned company falling under supervision of the Ministry of Transport and Communications.

Our response to the public consultation

We would like to address **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.**

TV viewing in Lithuania is very important, with average viewing per person per day at 3h44 in 2020 according to the European Audiovisual Observatory.

The Lithuanian Digital Terrestrial TV platform is the most popular TV distribution platform in the country, with a coverage of 99% of the population and a penetration of 35%. The platform is currently consisting of three multiplexes and is expanding with the introduction of one new national multiplex.

Access to the 470-694 MHz band is vital for the terrestrial broadcasting.

LRTC notes that for the 470-694 MHz band, the RSPG draft opinion is considering two options.

- **The option of leaving the current ITU framework unchanged (No Change) at WRC-23 is well adapted to the situation in Lithuania now and for the future,** after the efforts to clear the 700 and 800 MHz band and the ongoing investments in new multiplexes and technologies. **LRTC/Telecentras supports this option.** As a key national infrastructure, the broadcasting platform needs a stable regulatory framework to allow investment and innovation. If the band is to be discussed again at later Radio Conference, this should not be before WRC-31.
- **The option of introducing co-primary allocation to mobile, possibly with entry into force later.** Mobile and broadcasting service are technically not compatible in the same frequency band. Because of complex frequency coordination situation between countries, LRTC/Telecentras considers that co-primary would in practice create a threat to the stable allocation to broadcasting for all EU countries, including Lithuania. **LRTC/Telecentras does not support such option even if it is announced for a later date.**

Director of technologies Egidijus Ropė