RADIO SPECTRUM POLICY GROUP

Dear Sir/Madam, 3.08.2022 Ref.nr 2-1/45

LEVIRA welcomes the opportunity to answer the Radio Spectrum Policy Group DRAFT Opinion on the ITU-R World Radiocommunication Conference 2023.

About LEVIRA

Digital services company AS Levira is a technology partner for companies whose business depends on technology, but who want to involve a professional service provider to offer the necessary solutions.
Levira produces TV content, helps media service providers put together TV channels and ensures that programs are broadcast 24 hours a day, 365 days a year.
Levira is Estonia's main operator of TV and radio networks and runs one of the largest data centers in Estonia.
Levira's customers are international and local IT companies and media service providers.
Levira's shareholders are the Republic of Estonia and the French telecommunications company TDF with 51% and 49%, respectively.

Our response to the public consultation

Our point of focus is **the preparation of the EU 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.**
Through TDF, LEVIRA is represented in the European association of terrestrial broadcast networks operators (Broadcast Networks Europe BNE). **LEVIRA fully supports the response made by BNE.**
In addition, LEVIRA wants to draw the attention of RSPG on the very strong relevance of terrestrial television in the ESTONIAN context.

LEVIRA is a committed actor engaged to provide the infrastructure and services for the digital economy in which Estonia is taking a leadership role. We emphasize that this is not to be opposed to the high relevance of digital terrestrial television for the Estonian citizens and for our customers the public and commercial broadcasters. A significant effort was made in Estonia to vacate the 800 MHz and 700 MHz band from broadcasting transmissions with the assurance for broadcasting of long-term stability in access to the remaining spectrum 470-694 MHz.
TV viewing in Estonia is very important, with average viewing per person per day at 3h42 in 2020 according to the European Audiovisual Observatory edition 2021.
According to a recent survey by Turu-Uuringute AS, there are 208,000 viewers of free-to-air broadcasting in Estonia. Vabalevi FTA service covers the entire territory of Estonia and is the most effective and environmentally friendly method of delivering television images.
In addition to an attractive pay TV package of 40 channels, the Free-to-Air offering gives access to all the population to 3 national programs, to one from Poland, one from France one from Ukraine and one from the USA contributing to the pluralism of news and entertainment and fostering national culture, attractiveness, and openness of our country.
LEVIRA strongly opposes a co-primary allocation to mobile in the remaining band, even if it were to be effective later. LEVIRA is in favor of No change for this allocation at WRC-23. We consider that if any review of the current allocation is to be discussed again at later WRC, this should not be before WRC-31 to ensure stability to our sector and opportunity to innovate.

Tiit Tammiste
CEO

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