# 2RN Response to the Draft RSPG Opinion on the ITU-R World Radiocommunication Conference 2023

2RN is grateful for the opportunity to respond to the Draft RSPG Opinion on the ITU-R World Radiocommunication Conference 2023. 2RN owns and operates broadcast network infrastructure in Ireland. We distribute and broadcast TV and radio programme services for RTÉ (the Irish public service broadcaster and owner of 2RN) and other broadcasters. 2RN operates and broadcasts Ireland's free to air digital terrestrial TV (DTT) platform Saorview, covering over 98% of Irish households.

## No Change for WRC-23 Agenda Item 1.5

We believe that the outcome of WRC-23 Agenda Item 1.5 is currently the greatest threat to the future viability and development of terrestrial broadcasting in Ireland. A clear 'no change' recommendation, without a deferred implementation, or further review prior to WRC-31 is needed from the RSPG for the following reasons:

1. DTT provides free access to socially and culturally important trusted public service information from within member states. It delivers cost effective, secure and robust access in face of predicted increasing extreme weather events due to climate change.

2. DTT relies on the remaining UHF spectrum that has not already been assigned to Mobile. This spectrum has been successfully planned throughout Europe to enable systems to operate in harmony, between neighbouring countries, and to allow future development. DTT in Ireland and in Europe needs long term certainty on the future use of UHF spectrum to encourage continued investment.

3. The spectrum used by DTT is shared with PMSE users in the programme making and events industries who have no alternative spectrum or technologies available to replicate many existing services. The sharing relationship between DTT and PMSE is highly successful allowing both service types to co-exist and to continue to develop.

4. Sharing between Broadcasting and Mobile not possible (even over relatively long distances). We believe that a co-primary allocation for Mobile would inevitably lead to choosing Mobile over Broadcasting, and the loss of the unique set of benefits that DTT gives member states and their citizens.

5. We believe that more low band spectrum is not needed by mobile networks. In Ireland, and other parts of Europe, further spectrum already assigned to mobile is yet to be deployed and significant increases in efficiency in the use of existing mobile spectrum are still underway (i.e. migrated from 2G/3G to 4G/5G). Mobile capacity

and reach can only practically be increased by deploying more infrastructure, and making use of more mid-band spectrum in congested areas.

2RN is a member of Broadcast Networks Europe (BNE) and endorses the BNE response to this RSPG draft opinion.

Comments on specific sections of the RSPG consultation document are presented below, including further comment on WRC-23 AI-1.5.

**Section 1.4 – The need for an RSPG opinion.**

In addition to the benefits of harmonisation mentioned with respect to economies of scale and the circulation of equipment it is also worth considering that stability in harmonised spectrum is essential to give long term certainty to existing and developing sections of the industry. Increasing the number of incompatible harmonised systems within a region, for a piece of spectrum, dilutes the benefits of harmonisation for everyone.

The promise of greater flexibility should not be used as a tool to avoid the difficult challenge of making decisions for optimum spectrum use that should be provided by bodies like the RSPG.

**Section 4.3 – Agenda item 1.5**

Environmental impacts should be considered in addition to the aspects listed which need to be taken into account when considering regulatory options for the 470-694MHz band. Noting that DTT is an environmentally efficient way of delivering TV and video media to viewers (see LOCAT study[1]).

**Section 4.3.3 – RSPG recommendations**

We do not agree that the outlined recommendation is ensured by the option of a co-primary allocation to the mobile service to become effective at a later date. We believe that such an option (with the inevitable requirement of a date of implementation) would critically undermine the future viability of the terrestrial broadcasting platform curtailing investment and stifling innovation.

We agree that the EU position should avoid ambiguity. The clearest way for this is to recommend No Change at WRC-23. A further review could then be carried out at a later date - sufficiently far away to allow for current mobile spectrum to be more fully utilised and to allow for any further changes and developments in broadcasting and viewing habits.

**Section 4.7 – Agenda item 1.16 Non GEO ESIM Ka-band**

In taking due account of the condition that GSO systems operating in the same frequency band should be protected, we note that free to air broadcast satellite services currently use this band in Ireland to offer an alternative free to air option for public service viewers in areas not suitable for terrestrial broadcast reception.

[1] www.thelocatproject.org