From:	Vesa Erkkilä Sant
To:	CNECT RSPG
Cc:	Juurakko-Lehikoinen Suvi; Laitinen Kaisa (LVM); Mirka Meres-Wuori
Subject:	Public Consultation on the Draft RSPG Opinion on ITU-R World Radiocommunication Conference 2023 - Comments by SANT ry
Date:	vendredi 22 juillet 2022 08:00:06

Dear RSPG representatives

Please find below comments of SANT ry (Association for antenna and telecommunication contractors in Finland) to the RSPG22-014 “Opinion on the ITU-R World Radiocommunication Conference”. The comments apply to WRC-23 Agenda Item 1.5. and numbered opinions from 8 to 11.

8. RSPG recognises that the band 470-694 MHz is mainly used for downstream audiovisual content distribution and recommends that it remains as such for the long term, even beyond 2030;

9. RSPG recognises the importance of the DTT platform and the need to provide certainty for investments in broadcasting infrastructure. Therefore RSPG recommends that the frequency band 470-694 MHz shall remain available for DTT in the foreseeable future, i.e. 2030.

Comments:

It is important to ensure sufficient frequency resources for DTT, even after 2030. Despite of technological development and popularity of broadband connections, replacement of DTT by broadband delivery is not a realistic option in many countries. Wireless broadband will serve large share of households as primary broadband connection also in the future. Additional data load from audiovisual content to mobile networks would lead to high additional costs in mobile networks and additional costs to the households.

DTT with large broadcasting cell sizes is efficient for mass delivery. With small cell sizes, challenging indoor link budgets and many frequency bands and operators, mobile networks cannot get remarkable benefits from the broadcasting capabilities of mobile standards. Consumers are also used to traditional way of watching TV. Therefore, as long as there is need for simultaneous mass delivery of tv programs, it is best to continue using DTT for the purpose, especially in sparsely populated areas.

By maintaining sufficient frequency resources for DTT in the UHF-band, unnecessary loads to mobile networks are prohibited and all wireless networks can be operated economically and frequency efficiently.

10. Notwithstanding, the RSPG recommends that Member States should have the flexibility to use the 470-694 MHz band for Wireless Broad Band (WBB) downlink, provided that such use is compatible with the broadcasting needs in the relevant Member State and does not create a constraint on the operations of DTT in neighbouring countries. This is without prejudice to coordination agreements with the neighbouring countries.

Comments:

Flexibility is in principle favourable to allow optimal use of frequencies in the Member States.

It is, however, important to ensure wide awareness of the challenges of WBB downlink, like e.g.:

- Filling “holes” in area/frequency space with WBB downlink signals leaves less room for PMSE and smaller DTT stations. Typically these “holes” are in sparsely populated areas with less commercial importance.
- Support of different frequencies and modes of operation with mobile terminals is complex. It is easier and cheaper for both operators and manufacturers, when maximal frequency harmonization is in place. WBB downlink used only in few countries may not be an optimal solution for the mobile industry as a whole.

There are a lot of other frequency bands available for mobile industry with good terminal support. It might be better to still wait for few years and follow the development of DTT and TV usage overall, and postpone new mobile allocations in the UHF band towards year 2030.

BR

Vesa Erkkilä
Executive Director
SANT, Suomen antenni- ja teleurakoitsijaliitto ry
tel. 040 922 6480
vesa.erkkila@sant.fi
www.sant.fi