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DIGITA

Digita Oy comments to the Draft RSPG Opinion on ITU-R World Radiocommunication Conference 2023

Digita Oy appreciates the opportunity to comment on the Draft RSPG Opinion on ITU-R World Radiocommunication Conference 2023. Digita Oy is terrestrial network operator for both broadcasting and mobile networks.

Digita is in favor of 'No Change' to the Radio Regulations under WRC-23 agenda item 1.5 with following grounds:

Importance of linear TV to European media and culture must be supported

Europe consists of many smaller language areas which form a unique and diverse cultural entity. TV companies acting in European countries and local markets offer local content for audiences in that area. Terrestrial TV (DTT) delivery plays an important role in many of these local markets in securing the reach of the entire desired audience. E.g., in Finland almost 50 % of the population uses DTT as their primary TV reception.

It is worth noting that although also many European local players offer OTT services for their viewers, the market shares especially in the commercial services (SVOD, AVOD) are in favor of US based companies. The market share of the US based OTT players is already significant on European market, making European and domestic media companies' investments to (local) content increasingly risky, if the market shares keep switching towards global companies.

Advertising funded linear channels are often the backbone of European commercial TV companies' business. Also, the publicly funded BVOD (Broadcaster VOD) services are often very popular, but the diversity of the European audio-visual services needs also strong commercial service providers in Europe. This means that linear TV platforms should be developed and supported in order to secure wide European content offering also in the future. The role of free-to-air TV is becoming even further important for European citizens, as the increasing inflation and economic difficulties currently present on European market may effect households capabilities to pay for TV services.

Decreasing the spectrum available for DTT would hinder the broadcasting business in Europe

UHF spectrum of 470-960 MHz is the only spectrum available for DTT, whereas IMT and other mobile services have the access to multiple other (and already vast) spectrum resources. The usefulness of the 470-960 MHz band for IMT services is very limited due to the very low bandwidth and capacity and thus the hindrances compared to the benefits in moving the spectrum from DTT to IMT are overall significant.

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By adding availability of the spectrum resources used for the internet connections, the offering of OTT services becomes even more affordable for the global players. If the increase of spectrum availability is done at expense of European DTT networks this would affect directly to the competition environment of media service providers as the global players would be benefiting from the fast European Internet connections.
It is worth also noting that DTT is also an important means when reaching the whole population in times of emergency or crisis. Thus, well-functioning DTT business in normal times will take care of Europe's ability to use these resources also for the safety of its citizens if needed.

DTT is the most energy efficient distribution media of linear mass content

Broadcasting networks, by their nature, are designed to deliver same content simultaneously to large audiences. The content is being transmitted only once and received by all recipients at the same time. Contrary, the broadband networks are based on point-to-point connections, meaning that all the content are being delivered separately to each recipient. This means that when delivering linear audio-visual services which are watched mostly at the same time by all recipients, broadcasting is the most efficient means of delivery. One can compare this to private driving vs. public transport: when lots of people are going to same place at the same time, public transport is the most efficient and thus the 'greenest' means of transportation.

As shown in a recent study (The Locat Project[1]), DTT is the 'greenest' method for delivery of audio-visual content. However, the uncertainty caused by a mobile allocation at WRC-23 would mean broadcasting operators, despite rising energy costs, could not invest in more efficient transmitters. It would also indirectly result in a higher carbon footprint as, without certainty of tenure for the spectrum they use, broadcasters would hold back on innovation and development and the platform will effectively wither and die. With no DTT citizens will be forced to use more expensive less 'green' alternatives.

Thus, in the fight against climate change, the platform should be supported and actively developed also by the EU when going into the future, rather than the contrary.

[1] The Locat Project: https://thelocatproject.org/