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

Our major point of interest 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.**

TDF is a full member of the European association of terrestrial broadcast networks operators (Broadcast Networks Europe BNE). **TDF fully supports the response proposed by BNE and joined to this document.**

In addition, TDF wants to draw the attention of RSPG on the very strong relevance of terrestrial television in the French context.

France has been and is still a DTT country with a penetration of 48.7%, this figure even goes up to 59% in certain regions and 20.5% of households are exclusively receiving TV programs via the DTT platform.

After the 800MHz and 700MHz bands allocations to Mobile which excluded DTT and other services from this spectrum, DTT only relies on the 470-694MHz in which six national multiplexes are deployed; All these multiplexes have been coordinated with our neighbours and the difficulty of this planning area doesn't authorize the development of an additional full national coverage.

Some resources have been nevertheless identified to allow the start of new UHD multiplex which with takes place in the Audio-visual law that have been voted in 2021 and shows the national interest for the platform on the long run and the necessity to keep spectrum available to allow the modernization of the platform.

TDF strongly opposes a co-primary allocation to mobile in the remaining band, even if it were to be effective later. TDF is in favour 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 a later WRC, this should not be before WRC-31 to ensure stability to our sector and opportunity to innovate.

BNE answer to RSPG consultation on the ITU-R World Radiocommunication Conference 2023:



RSPG WRC23 Public Consultation - BNE.pdf