

Public Consultation on the Draft Radio Spectrum Policy Group Opinion on the EU-level policy approach to satellite Direct-to-Device connectivity and related Single Market issues
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EBU inputs

The European Broadcasting Union (EBU), the world's leading alliance of public service media¹, welcomes the possibility to send comments to the Public Consultation on the Draft Radio Spectrum Policy Group (RSPG) Opinion on the EU-level policy approach to satellite Direct-to-Device connectivity and related Single Market issues.

In the context of this consultation, the EBU would like to convey two points, which, although they are not core to the draft Opinion, are key for distribution and production of broadcasting services and for PMSE audio usages at large.

First, the EBU applauds that the RSPG recommends the European Commission to request a mandate to the CEPT to harmonise technical conditions for Direct-to-Device IMT (D2D IMT). This will be key for the protection of both terrestrial IMT and other services. This is even more important as WRC-27 Agenda Item 1.13 suggests studying the use of frequencies between 694MHz and 2.7GHz for D2D IMT. In this context, the EBU recalls that it is essential that terrestrial broadcasting and PMSE services can still make use of the frequencies in the Lower UHF band up to 694MHz included. The entirety of this band is heavily used not only for both distribution and production of broadcasters' content, but also for any audio PMSE use, such as theatre productions, political meetings, religious gatherings, music festivals, sport events, etc. which happens both in-door and outdoor, and in urban and rural areas. It should be noted that these uses are increasing, for a flurry of reasons – to name a few: AV content production (be it sport, drama, documentaries, etc.) are well sought for, both for linear and non-linear platforms; (music) artists are touring more and more as live events are an increasingly important part of their revenues; in an age of dematerialisation of content, audiences are eager to enjoy “real life” experiences. Besides, cordless cameras and terrestrial mobile video links are operated by broadcasters for PMSE purposes in different harmonised tuning ranges in the 2 GHz band as well as Audio PMSE (DECT) applications; these uses also need to be preserved.

Secondly, the EBU welcomes also the RSPG recommendation to improve receivers blocking to reduce impact of adjacent channel interferences. This recommendation in the Draft Opinion is, however, limited to MES terminals in the L-Band. Such recommendation could actually be applied to any terminal.

The EBU remains available for any further information on this topic or related.

¹ The EBU has 113 member organisations in 56 countries who operate nearly 2,000 television, radio and online channels and services and reach an audience of more one billion people in 160 languages. More information about the EBU is available on the website: www.ebu.ch.