

30 July 2013

EBU Response to RSPG draft opinion on Licensed Shared Access

The European Broadcasting Union (EBU) welcomes the opportunity to submit its comments on the draft RSPG Opinion on Licensed Shared Access (LSA).

The EBU represents Public Service Broadcasters in 56 countries, including all 28 EU Member States. The EBU's mission is to defend the interests of public service media (PSM) and to promote their indispensable contribution to modern society. It is the point of reference for industry knowledge and expertise.

The EBU comments mainly address the RSPG's recommendation with relevance to the UHF broadcasting band, but also includes other bands.

The UHF broadcasting band

Broadcasters have a long tradition for sharing spectrum using principles similar to those outlined in the RSPG opinion. Broadcasting (transmitter networks) and PMSE (wireless microphones and in-ear monitors) have shared spectrum for decades. This does not only apply to PMSE used by broadcasters themselves but also to other professional PMSE users such as theatres and touring shows. Both licensed and license exempt use of PMSE is in use, depending on national legislation.

Broadcasting and PMSE require regulatory clarity and certainty to ensure further investments and innovation both for a sustainable broadcasting platform and for PMSE users and industry.

The case of licensed use of PMSE could be considered an example of the LSA concept. In those countries where PMSE is license exempt it would appear that PMSE would not be protected from LSA applications. This latter case would imply a further loss of spectrum available for PMSE and in turn would seriously compromise the ability of broadcasters and related industries to provide coverage of important cultural and social events. Therefore any agreement to allow future LSA access to broadcasting interleaved spectrum should only be in the context of ensuring that there will be sufficient spectrum availability to enable long-term and peak-demand PMSE use.

Cognitive radio has the potential to significantly improve the efficiency of using the radio spectrum. The EBU believes that cognitive white space devices should be licensed with well defined conditions (e.g. mandatory use of geo-location data bases) in order to ensure that they do not interfere to broadcasting services and PMSE. That would be another example of the LSA concept.

EBU would support the LSA concept in principle, however, given the need for broadcasting networks to continue to develop, and for continued coexistence of PMSE use in this band, the EBU sees little scope for its use in the UHF broadcasting band beyond its possible application for PMSE.

Other bands

The principle of the LSA concept could be applied to any frequency band occupied by any service. For example, the use of the 2300-2400 MHz band by wireless cameras is currently on a non-interference and non-protection basis, shared with military services but the use of the LSA concept for wireless cameras could give a QoS guarantee.

Sharing between mobile broadband services and other services should be explored further, for example viability of technologies such as cognitive radio in the mobile spectrum. The regulatory concept LSA could also be applied in these cases.