



Radio Spectrum Policy Group
DG CNECT B4
Spectrum – Office: BU33 7/55
European Commission,
B-1049 Bruxelles,
Belgium

21 December 2015

Dear RSPG Secretariat,

We write in response to RSPG's recent call for comment on three documents. Specifically the:

- Draft RSPG Report on Efficient Awards and Use of Spectrum;
- Update of the RSPG Work Programme; and
- Draft RSPG Opinion on the Review of the RSPP (Radio Spectrum Policy Programme).

The critical matter for broadcasters remains stability and security of tenure. Stability is critical for both the DTT platform and for PMSE equipment users. In this respect, the outcome of WRC-15 agenda item 1.1 was encouraging for broadcasters. The consensus reached by administrations for no change to the allocation in 470-694 MHz band either now, or at WRC-19 in four years' time, provides certainty for users and confidence for investors. If the rules had changed, DTT would have been left without dedicated spectrum, risking investment in the platform.

DTT's use of the airwaves has become ever more efficient¹ which has allowed broadcasters to free up more spectrum for mobile broadband use while enabling DTT viewers to continue to enjoy the nation's favourite channels, free-to-air. We therefore welcome the RSPG work programme which is line with the WRC-15 decisions and future WRC-19 agenda items.

We also welcome the draft RSPG Opinion on the Review of the RSPP. This addresses important matters for broadcasters including:

- The need for any future RSPP to take address the needs of a range of spectrum uses going beyond wireless broadband;
- The need to take account of the variety of spectrum needs across Member States;
- Recognition of differences between Member States in respect of wireless broadband demand and utilisation;
- The recommendation that no overall target for spectrum to be made available for wireless broadband in the next RSPP;
- The need of certainty and stability for PMSE; and
- Support of promotion of adequate receiver performance

There will however need to be robust consideration of the proposal for use of sub-700 MHz spectrum for downlink only technologies even if priority is given to broadcasting networks. In the UK this spectrum is

¹ See further: Communication Chambers, [The value of Digital Terrestrial Television in an era of increasing demand for spectrum](#), January 2014 and Aetha, [Should AIP be assigned to broadcasting spectrum?](#), May 2013.

already shared by DTT, PMSE and soon whitespace devices will be deployed. We understand technical studies have not yet been undertaken that show how these uses could coexist with downlink only technologies. Setting aside the technical challenges, there is also an important question as to how providing 'flexibility' in sub-700 MHz can be done without undermining the stability and certainty required for continued investment in existing uses including DTT and PMSE.

Nevertheless, we are encouraged by the proposals set out in these consultations and look forward to further engagement on these and other issues during 2016.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Helen Charles', with a horizontal line underneath.

Helen Charles
Senior Policy Adviser

Cc: Helen Keefe, Head of International Policy
Daniel Wilson, Head of UK Policy