
VPRT's Comments on the Draft RSPG Opinion on Review of Spectrum Use

10 January 2012

The Association of Commercial Broadcasters and Audiovisual Services in Germany (VPRT) represents the interests of approximately 140 companies operating in the fields of commercial television, radio and multimedia. VPRT welcomes the opportunity to comment on balanced draft RSPG Opinion on Review of Spectrum Use.

In the course of the negotiations on the Commission's "proposal for a decision of the European Parliament and of the Council establishing the first radio spectrum programme" VPRT has emphasized the importance of reliable access to infrastructures for commercial broadcasters in order to deliver their content to the users and contribute to media pluralism and cultural diversity.

We support the aim to establish an inventory of the existing uses of spectrum and that an evaluation of the demands shall be undertaken before making a specific decision on certain bands.

In our contribution we will take a horizontal approach in order to underline some of the key points and safeguards, which should be taken into consideration in any future discussion regarding the spectrum review.

1. Transparency and stakeholder involvement

VPRT believes that the process of the spectrum review as well as the methodology should be totally transparent and that all stakeholders should have the opportunity to get involved in the process. In any case the procedure should ensure an open review and analysis as well as to consider all interest groups in an equal manner.

2. Spectrum Efficiency

With regards to spectrum efficiency, we support a differentiated approach. VPRT believes that spectrum efficiency must respect the economical, social and cultural value. Such a balanced approach is also intended by the framework directive (Art. 9 (1)). The evaluation of the different aspects of spectrum efficiency might be challenging and needs to respect national circumstances as well as national competences.

Furthermore, the consequences of the migration from one compression standard to the other in order to enable a more technical efficient spectrum use (e.g. MPEG-2 to MPEG-4) should be taken into account. In this context we would



like to highlight, that a sufficient range of spectrum for simulcasting is needed. Also, the costs and the time frame for replacing the equipment by consumers should be part of the considerations.

3. Reliability and planning certainty

Digital terrestrial television is an established way of delivering broadcasting content and services, which commercial broadcasters have supported with a large amount of investment. We therefore would like to reiterate that commercial broadcasters must be able to rely on legal and planning certainty, which respects the requirements of the Telecom Package and the past investments of commercial broadcasters. Therefore existing services and the opportunity to development broadcasting services in the future should be guaranteed. Furthermore, VPRT strongly supports an assessment of the impact to existing users such as the cost of migration, possible loss of services and/or technical reach and the possible infringement of existing services through interference which may be caused by new services or new technologies (e.g. cognitive radio).