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The EBU response to the Public consultation on the draft RSPG Opinion On Review of Spectrum Use

The European Broadcasting Union¹ (EBU) welcomes the opportunity to submit its comments on the draft RSPG Opinion on Review of Spectrum Use.

The European Parliament is about to give its final green light to a European decision establishing a first multi-annual Radio Spectrum Policy Programme (RSPP). The RSPP is to define the objectives for the planning and harmonisation of the use of the spectrum across the Community. The decision includes an inventory of existing uses and an analysis of technology trends, future needs and demand for spectrum.

The draft RSPG Opinion discusses the objectives and methodology for the spectrum review.

Summary

When reviewing the spectrum use, it is necessary to introduce clearly defined and transparent assessment criteria and methodologies to assess technical efficiency of existing uses of all services. The outcome of such an assessment will largely depend on the criteria and methodologies applied.

Public service broadcasters support the review of the spectrum use including the creation of an inventory of existing spectrum use and possible future needs for spectrum in the Union. Spectrum is a scarce natural resource which is crucial for the delivery of services to the whole society as well as to fulfil important economic as well as social, political and cultural functions. Efficient use of spectrum is very important and shall be required from all users.

The use of spectrum is highly influenced by national situations (economic, geographic, cultural, etc.) and this should be taken into account.

It is recognised that reviewing the spectrum use and determining the most efficient use of spectrum is a complex process. EBU believes that all stakeholders should be involved in this process with the main tasks carried out by the CEPT, the recognised expert organisation in European spectrum management. The EBU and its Members will be pleased to contribute to this process.

¹ The EBU is the world's largest professional association of national broadcasters, whose Active Members are public service broadcasters in 56 countries corresponding to the ITU European Broadcasting Area, which includes all European countries, Central Asia, North Africa and the Middle East. Associate Members include broadcasters from Canada, the USA, Japan, Chile, South Africa, India and Hong Kong, as well as many others.

The EBU's purpose is to serve and support the interests of its Members, promote cooperation between broadcasters and facilitate the exchange of audiovisual content. The EBU works to ensure that the crucial role of public service broadcasting, which is central to Members' activities, is recognised and taken into consideration by decision-makers.

The organization provides services to the broadcasting community at large, along with expertise specifically to Members on legal, technical and programming issues. It also conducts economic and market analyses and offers targeted training programmes. For more information about the EBU: www.ebu.ch.

EBU responses to the specific sections of the draft RSPG Opinion

Section III – Objectives and Methodology for the spectrum Review

EBU supports the objectives of the review of spectrum use as defined in the draft RSPG opinion:

- Visibility on spectrum needs for electronic communication services
- Transparency on the spectrum usage across different countries
- Facilitate access to spectrum while ensuring compatibility with existing users
- Efficient use of spectrum including innovative solutions to increase the shared access to spectrum

The methodologies used in the forecast of capacity and spectrum requirements should be made available to all relevant stakeholders. The stakeholders should have the opportunity to be involved in the process of assessing spectrum needs.

It is crucial that spectrum needs of all services and their evolving requirements are considered.

The proposed three phases of the process are commented in the sections V, VI and VII below.

Section IV – Identifying the responsible entities which should contribute to the review

EBU, the identified European body in the broadcasting domain, will be willing to contribute to the spectrum review with requirements from Public Service Broadcasters.

Also in the broadcasting domain, the RSPG might consider to consult BNE (Broadcast Networks Europe) and DigiTAG (Digital Television Action Group).

Section V - Assessing Demand for Spectrum

The EBU agrees with the sources of information mentioned in the Opinion to build up the assessment of future demand for spectrum. This may include forecasts of capacity requirements. Details of the methodologies and criteria employed in the assessments should be made available and compiled together with the forecasts that focus on the European market.

The demand of spectrum should be evaluated for short and medium term time periods. Evaluation for the longer term might be extremely difficult to predict in an accurate and balanced way for all services requiring access to the spectrum. It is however necessary to retain some flexibility to allow for gradual evolution of technologies.

Evolution to new more innovative and spectrum efficient technologies will drive, among other things, the spectrum demand. During the transition periods towards new technologies additional spectrum may be required to facilitate the progressive deployment of upgraded networks and renewal of users' equipment.

Spectrum demand for different uses, whatever they may be, will depend on national circumstances and these needs to be considered. It could be recognised that benefits will accrue from greater harmonisation across Europe, but that it can only be done if all national requirements are met.

Assessing demand of spectrum will require experts in many different domains, including experts on network and frequency planning. Therefore EBU believes that although this phase of the spectrum review could be undertaken mainly under the responsibility of the EC, all relevant stakeholders and national administrations, including the CEPT (the organisation that

gathers experts in different domains), need to be consulted. The process should be transparent and visible to all stakeholders.

Section VI – Quantifying the supply of spectrum

EBU believes that a study of the current use of the spectrum is an essential part of the process and should be started in parallel with the study of spectrum demand.

The information already available in the EFIS [European Communications Office Frequency Information System] data base should form the basis of the work as it already enables the collection of the required information and might be conveniently extended to accommodate additional parameters. National administrations can readily complete the EFIS data base where necessary. Therefore the overall task of providing information should be the responsibility of national administrations with the CEPT as a centralised point to harmonise the information.

It is important to note that whilst EFIS can provide an overview of current usage of frequencies, planned usage should also be considered. For example, the GE06 Plan gives an overview of the planned spectrum usage of DTT and DAB; frequencies or allotments might be licensed but still in the process of being implemented.

Section VII – Analysis of the spectrum review (demand and supply)

This phase should include an evaluation of the efficient use of the spectrum. The RSPG Opinion explains the efficiency of spectrum use in terms of technical efficiency, functional efficiency and economic efficiency. The three factors are to be weighted when assessing spectrum efficiency and which weight to give to each factor will depend on the scenario. In some cases the relative weighting might be particularly challenging as for example when assessing the social and cultural value of an application.

The technical efficiency should include an analysis of how underused frequency bands can be better exploited and the options that can be implemented to optimise the use of allocated bands. This process should include the cost factors i.e. for transition to more efficient technologies and the cost impact to users for the renewal of their equipment.

It is also important that any review of spectrum use considers national circumstances.

Section VIII – Some challenges in assessing the suitability of frequency bands for new services and applications

The RSPG opinion gives a very detailed and complete list of necessary tasks to be undertaken and of issues to be addressed in the review of spectrum use. It will require large amounts of work to be carried out by Administrations and stake holders alike. The work load and time schedule to accomplish the study needs to be considered in planning overall time scale for the process.

Section IX – The Opinion of the RSPG

EBU supports the recommendations of the RSPG and the tasks identified in order to achieve a balanced review of the spectrum use. We would like to highlight the following points:

- The importance of providing a transparent view of the criteria and methodology used in the process as well as the involvement of all stakeholders in the whole process.
- The use of existing sources of information (such as EFIS and national data bases) as starting points will facilitate the tasks to be accomplished. The experience of CEPT will also be invaluable.

- The process should also study the options for maximising the efficient use of all frequency bands whilst at the same time taking into account social, cultural and economic considerations.
- An evaluation should be made on the impact of spectrum refarming to existing users (costs, loss of services, delays in the implementation of new services, difficulties to evolve to new innovative technologies and applications etc).