

Reply from Finland to the public consultation on the Draft RSPG Opinion on a long-term strategy on the future use of the UHF band (470-790 MHz) in the European Union

Finland supports to the draft opinion and sees that it reflects the current situation of the UHF band 470 - 790 MHz in Europe as well as the developments and expected evolution in the future.

Concerning the 700 MHz band Finland has already decided to make the band available for wireless broadband in the beginning of 2017 and, therefore supports the overall deadline making the band available for ECS to be as early as possible and 2020 at the latest. Finland believes that setting an earlier deadline encourages also those Member States which have not yet made the decision on the 700MHz band to start the transition planning which in every case takes time. This would support the European wide transition process as well as ease and fasten the overall cross-border coordination. Thus, Finland also sees that it is important to encourage the Member States to start the coordination negotiations as soon as possible as pointed out in the Opinion.

Concerning the lower UHF band 470 - 694 MHz Finland sees that it is important for Member States to have the flexibility to use the band for downstream content distribution independent of the platform. Finland is of the opinion that when concerning the availability of the band for DTT, a specific year should not be stated in the Opinion since the situation between Member States differ and it is difficult to predict the future and developments. Thus, the situation should not be locked for the next 15 years at this stage (i.e. up to 2030). When WBB platform evolves to be a viable solution for broadcasting of traditional television content, Finland sees that, while maintaining broadcasting service in the band 470-694 MHz, Member States should also have the possibility for co-primary mobile allocation in the band 470 - 694 MHz.

Finland is also of the opinion that when considering any options for the future usage of the frequency band 470-694 MHz, all the different aspects including technological developments, evolution on consumer behavior as well as requirements set by general interest objectives (i.e. free to air television) need to be taken into account. Especially public interest objectives and requirements need to be evaluated independent of the delivery platform in order to support the developments and guarantee the availability of these services for all.

Related to the previous issue Finland proposes option II to be added to the last paragraph of the section 7.3.1 (see Annex 2 for the proposal) as well as same clarification to the opinion itself.

Concerning the Opinion chapter 9 Finland proposes to improve the readability and clarity by re-structuring the chapter. The changes compared to the initial Opinion itself are shown with revision marks and comments (see Annex 1).

Annex 1

9 The Opinion of the RSPG

The RSPG notes

1. that implementation of the necessary provisions facilitating all Member States to meet the final deadline of making the 700 MHz band available for ECS requires adequate time
2. that some Member States have already started cross-border negotiations

The RSPG recognises

1. the importance of the 700MHz band in the provision of wireless broadband across the EU ~~and supports the provision of wireless broadband services in the 700 MHz band~~
2. that the DTT platform evolves towards new broadcasting technologies in the UHF band (i.e. DVB-T2 and/or possibly HEVC)
3. that the band 470-694 MHz is mainly used for downstream audiovisual content distribution
4. the importance of the current DTT platform and the need to provide certainty for investments in broadcasting infrastructure
5. ~~that there is a~~ need for ~~to have~~ technically appropriate and sufficient spectrum for PMSE and considers that depending on developments and requirements of such services, there could be a need to identify additional spectrum above 1 GHz
6. that in case of reallocation of a frequency band a ~~the mechanism of any possible~~ compensation is a national issue
7. that implementation of broadband PPDR networks is a national issue

Comment [SJL1]: already included in recommends 3

Comment [SJL2]: Wireless mics are typically used over short distances / LOS which would allow also higher frequencies to be used

The RSPG recommends

1. the Commission, in cooperation with the Member States, striving towards a coordinated approach, including:
 - a. Defining, as early as possible the harmonised technical conditions for the use of 700 MHz by wireless broadband services.

- b. Proposing in a binding legislative measure such as an RSPP, the deadline by which the national authorisation process should be finalised and the deadline for making the band available for effective use for ECS in line with harmonized technical conditions.
2. that Member States should shall undertake the 700 MHz transition as soon as possible, noting that there are numerous challenges to overcome ~~but still urging Member States to move quickly~~
 3. Member States to make the 700 MHz band available for WBB as early as possible setting a final deadline of 2020 for making the band available for effective use for ECS. ~~Two dates are under consideration i.e. 2020 and 2022.~~ This is without prejudice to constraints arising from cross border frequency coordination problems with third countries.
 4. that Member States should develop and communicate to stakeholders and neighbouring countries in due time, a framework for the migration of broadcasting services below the 700 MHz band and also to take into consideration all practicable efforts to accommodate the various timelines of their neighbours ~~for either implementing WBB or not;~~
 5. that ~~all the remaining~~ Member States begin negotiations as early as possible to ensure that all necessary cross-border coordination agreements will be finalized at the latest by the end of 2017, taking into account the 3 year period envisaged by the RSPG Report "on proposed spectrum coordination approach for broadcasting in the case of a reallocation of the 700 MHz band". Member States should shall apply guidelines of the RSPG Report referenced above.
 6. those Member States with non-EU neighbouring countries to start bilateral negotiations with those countries as early as possible to reach the necessary cross-border coordination agreements
 7. that the European Commission should, in cooperation with Member States support national measures to facilitate transition to more spectrum efficient television technologies, including those mandating the inclusion of such technologies in the TV receivers
 8. the band 470-694 MHz remains mainly used for downstream audiovisual content distribution for the long term, ~~even beyond 2030;~~
 9. that the frequency band 470-694 MHz shall remain available for DTT in the foreseeable future, ~~i.e. 2030.~~

Comment [SJL3]: A specific year should not be estimated /stated due to differing situations in each Member State

10. that Member States should ~~/shall~~ have the flexibility to use the 470-694 MHz band for WBB downlink, provided that such use is compatible with the broadcasting needs in the relevant Member State and ~~it can be coordinated with~~ ~~does not create a constraint on the operations of DTT in this band, including for~~ neighbouring countries

Comment [WT4]: It is the responsibility and within the power of the member state to assess whether broadcasting content is delivered thru DTT or WBB, if WBB is chosen it is obvious that it will constraint DTT but the decision is to be taken by the member state. Also when WBB stations are brought into service using provisions of GE06, they may lead to constraints in operations of DTT in the band, especially if changes are needed to the DTT network in future, thus the question is really whether WBB can be coordinated with neighbouring countries.

11. that, when considering any options for the future usage of the frequency band 470-694 MHz, aspects such as the requirements, technological developments, consumer behaviour, the importance of delivering free-to-air television and the various political, social, cultural and economic general interest objectives ~~when this is achieved through the DTT platform,~~ should be taken into account

Comment [SJL5]: These aspects, especially those concerning general interest objectives, are important to be taken into account independent on the platform and these considerations should not be tied only to DTT

12. ~~that~~ the PMSE industry ~~is encouraged~~ ~~should/shall~~ ~~to~~ develop more advanced and spectrum efficient technologies

Comment [SJL6]: This one proposed to be a recommendation instead of encouragement

~~12.13. and.~~ ~~In addition~~ Member States ~~to~~ ~~should~~ ~~also seek to~~ promote spectrum sharing and ~~to~~ ensure that license conditions in bands currently used for PMSE are as flexible as possible

~~13.14.~~ that the ~~C~~ommission assists the transition ~~of broadcasting services~~ by providing early guidance to the relevant Member States, in particular clarifying cases where it would not be compatible with state aid rules

~~14.15.~~ that TV receiver standards should take full account of the evolution of the 700 MHz band and include as early as possible appropriate receiver parameters (e.g selectivity and blocking)

~~15.16.~~ that the Commission liaises with ETSI and CENELEC to ensure that ~~the new development~~ ~~any new radio system~~ in the 700 MHz ~~and 470-694 MHz bands~~ will be fully taken into account when writing or revising EMC and "radio" harmonized standards for TV receivers and for any other electronic products (such as antenna mast amplifiers) intended for TV installations

Comment [WT7]: When member states are given the flexibility to use WBB and DTT in the 470-694 MHz band, this should also be reflected in standardisation of WBB and DTT equipment to fulfill the requirements of the Radio Equipment Directive.

Annex 2

7.3.1 Description of options for the band 470-694 MHz

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Taking into account expected service and traffic characteristics as well as recent and supposable developments and long term scenarios, three main options for the future usage can be conceived:

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II. Usage of the band for distribution of audiovisual content by either a combination of DTT platforms and/or cellular terrestrial networks (hybrid) or evolved/new cellular networks only, in which broadcast and mobile broadband services are provided through additional downlink capacity.

III. Usage of the band by either a combination of DTT platforms and cellular terrestrial networks (hybrid) or only by evolved/new cellular networks, in which broadcast and mobile broadband services are provided through both uplink and downlink. Currently, the band is used for the delivery of television which can be expected to continue in the foreseeable future.

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The Public Service Media obligations concerning the availability and coverage, i.e. to be available at the point of access for all and for free, are generally defined in the law. Therefore, if option II or option III is to be considered for the delivery of public service broadcasting and other free-to-air programs in the long term, the prerequisites of the platforms concerned and cost effects should be thoroughly investigated. These prerequisites might include interalia, regulatory and legal factors (e.g. "must carry" rules, rules for general interest content, net neutrality ...) economic factors affecting the delivery costs for television market players and individual citizens, as well as technological matters such as quality, availability and reliability of networks.