



RSPG – Public consultation on

Draft RSPG Opinion

***on a long-term strategy on the future use of the UHF band (470-790 MHz) in the
European Union***

Submissions by PT Portugal



RSPG Consultation on “Draft Opinion RSPPG14-585 (rev1)”

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Introduction

PT Portugal (PT) welcomes the opportunity to express its views on RSPG “Draft RSPG Opinion on a long-term strategy on the future use of the UHF band (470-790 MHz) in the European Union” (RSPG14-585 (rev1)).

Digital Convergence is blurring frontiers between historically separate worlds, both greatly valued by consumers, the Broadcasting and Mobile Services worlds. Analogue Television Switch Off freed a considerable amount of spectrum in premium frequency bands and triggered the discussion on the future use of the UHF band that essentially consists in finding answer to the question - "what is the spectrum use with higher value, social and economic, for the European citizens?".

RSPG consultation is a valuable contribution to the debate.

Comments regarding the 700 MHz band (694-790 MHz)

PT supports the allocation of the 700 MHz band to the provision of wireless broadband, namely mobile broadband, and considers the harmonisation of the technical conditions an essential measure to promote innovation and competition.

In our view, the harmonisation process must consider the context of the convergence of platforms and the trend of technologies. We support the channelling arrangement proposed by CEPT (draft Report 53), including the lower edge at 694 MHz.



PT considers of the utmost importance that any binding legislative measure allows some degree of flexibility to Member States in the implementation.

In defining any deadline at the European level, for authorizations, for making available, or for other purpose, it is imperative to consider that situation differs considerably from Member State to Member State, especially in what concerns the development and penetration of DTT.

We fully support RSPG recommendation for Member States (MS) to undertake the transition as soon as possible. Nevertheless, PT considers that 700MHz band should be made available for WBB after 2020, namely 2022, or later. However it is of great importance to give a clear sign of certainty to the stakeholders, namely manufacturers.

The implementation of binding measures (EU decisions) will be a rather complex process and will require full commitment of Member States in cross-border negotiations. We support RSPG recommendation to start bilateral negotiations as soon as possible.

Comments regarding the UHF band (470 – 694 MHz)

In Europe, broadcasting services, namely DTT, are of a great economic, social and cultural importance and, in our view, the necessary conditions must be provided for its maintenance and development, especially for the delivering of FTA services. However, MS and Europe should avoid the adoption of measures that may discourage innovation and deter the emergence of alternative platforms.

We agree with RSPG when it says that the UHF band shall remain available for DTT in the foreseeable future and that MS should have the flexibility to use the 470-694 MHz band for WBB downlink. Further technical studies, harmonization and standardization are required in order to have the ability to adapt and take advantage of uncertain requirements (e.g. flexibility of usage, convergence, 5G requirements). Nevertheless, PT believes that it would



be very helpful if the RSPG clarifies its opinion regarding the possible allocation, at WRC 15, of the UHF band to WBB services on a co-primary allocation basis.

It is our strong believe that maintaining the availability of the 470-694 MHz band for DTT operations, with sufficient spectrum, must not prevent the allocation of the band, on a co-primary allocation basis, to the WBB services already in the WRC 15. It is a matter of consistency with the European framework for electronic communications which determines the application, whenever possible, of the principles of neutrality, technology and service and, above all, is a strong sign of commitment to innovation and the development of converging technologies that can be given to European manufacturers and other stakeholders.

In what concerns spectrum for PMSE, PT supports RSPG recommendation for PMSE industry to develop more advanced and spectrum efficient technologies.

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