



7th January 2015

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

CRTV considers essential to guarantee to digital terrestrial broadcasting an evolutionary path towards new generation networks in order to ensure to all European citizens an high quality free to air linear TV.
Consequently CRTV supports no mobile allocation in the band 470 – 694 MHz.

It is well known the Italian digital terrestrial market. In details:

- Italy has the most intensive use of UHF spectrum for broadcasting with respect to all other countries in Region1:
 - o 19 national DVB-T/T2 multiplexers (MUXes) are in operation and 1 additional MUX has been assigned under the digital dividend bid in 2014.
 - o An average of 10 MUXes are in operation at regional/local level.
 - o More of 30% operating frequencies are in 700 MHz band.
 - o Frequencies digital rights have 20 years duration starting from 2012 (only the digital dividend but MUX start from 2014). This means that operators have planned their activities until 2032 (and 2034).
- Italy is using SFN techniques for national coverage
- Italy has more than 14 European boundaries States and borders countries outside the EU.

At European Level, the deadline for the releasing the 700 MHz should take in the utmost consideration the national specific, considering that:

- Any harmonization process should be pursued only after cross border coordination;
- An adequate transition period should be taken into account for broadcasting re-farming and transition from DVB-T toward DVB-T2 with HEVC coding.

CRTV considers essential to guarantee to operating networks operators the prosecution of all their activities also after 700 MHz band is made available for wireless broadband services.

With reference to RSPG draft Opinion, CRTV has the comments listed below.



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9 The opinion of RSPG	CRTV comments
<p>RSPG supports the provision of wireless broadband services in the 700 MHz band, and recommends the Commission, in cooperation with the Member States, striving towards a coordinated approach, including:</p> <ul style="list-style-type: none">- Defining, as early as possible the harmonised technical conditions for the use of 700 MHz by wireless broadband services.- 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.	<p>The provision of wireless broadband services in the 700 MHz band by a neighboring country should not impact on the legitimate use of the same band by a broadcasting service in the neighboring country.</p> <p>CRTV believes that it is necessary to protect the broadcasting legitimate uses as long as the 700 MHz band will be allocated to broadcast services in a specific member state.</p> <p>The co-primary allocation principles should be retained as the basic for any harmonized technical conditions.</p>
<p>Recognising the importance of the 700MHz band in the provision of wireless broadband across the EU, the RSPG recommends that Member States should undertake the transition as soon as possible, noting that there are numerous challenges to overcome but urging Member States to move quickly.</p>	<p>Any transition at European Level should take in the utmost consideration the national specific.</p>
<p>RSPG recommends Member States to make the 700 MHz band available for WBB as early as possible setting a deadline 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.</p>	<p>The deadline for the releasing the 700 MHz should take in the utmost consideration the national specific.</p> <p>Any transition should take place only after cross border coordination has taken place.</p> <p>CRTV considers essential for Italy to start cross border coordination as soon as possible.</p>



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<p>RSPG recommends 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;</p>	
<p>In order to facilitate adequate time for implementation of the necessary provisions to facilitate all Member States meeting the final deadline and noting that some Member States have already started cross-border negotiations, RSPG recommends that 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 apply guidelines of the RSPG Report referenced above.</p>	<p>CRTV considers essential for Italy to start cross border coordination as soon as possible.</p>
<p>RSPG recommends 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</p>	<p>CRTV believes that any cross border coordination with non-EU neighboring countries should start after cross border coordination with EU neighboring countries has taken place.</p>



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<p>RSPG recognizes that the DTT platform evolves to new broadcasting technologies in the UHF band (i.e. DVB-T2 and/or possibly HEVC) and recommends that the European Commission should, in cooperation with Member States support national measures to facilitate transition to more spectrum efficient technology, including those mandating the inclusion of such technologies in the TV receivers;</p>	<p>CRTV considers essential for the DTT platform to evolve to new broadcasting technologies in the UHF band (i.e. DVB-T2 and HEVC) in order to accommodate exclusively HDTV and UHD TV contents having new color space, higher frame rate, higher pixel resolution and improved audio systems and recommends that the European Commission should, in cooperation with Member States support national measures to facilitate transition to more spectrum efficient technology, including those mandating the inclusion of such technologies in the TV receivers.</p>
<p>RSPG recognises that the band 470-694 MHz is mainly used for downstream audiovisual content distribution and recommends that it remains as such for the long term, even beyond 2030;</p>	<p>CRTV consider essential for RSPG to recommend that the frequency band 470-694 MHz shall be allocated to the broadcasting service on a primary basis in the foreseeable future, i.e. 2030. Any use of the 470-694 MHz band for WBB downlink should not interfere with the broadcasting services.</p>
<p>RSPG recognises the importance of the DTT platform and the need to provide certainty for investments in broadcasting infrastructure. Therefore RSPG recommends that the frequency band 470-694 MHz shall remain available for DTT in the foreseeable future, i.e. 2030.</p>	<p>CRTV consider essential for RSPG to recommend that the frequency band 470-694 MHz shall be allocated exclusively to the broadcasting service on a primary basis in the foreseeable future, i.e. 2030.</p>
<p>Notwithstanding, the RSPG recommends that Member States should 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 does not create a constraint on the operations of DTT in this band, including for neighbouring countries;</p>	<p>Any use of the 470-694 MHz band for WBB downlink should not interfere with the broadcasting services.</p>



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RSPG recommends 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.	
The RSPG believes that there is a need to have technically appropriate and sufficient spectrum for PMSE and consider that depending on developments and requirements of such services, there could be a need to identify additional spectrum. RSPG encourages the PMSE industry to develop more advanced and spectrum efficient technologies. In addition Member States should also seek to promote spectrum sharing and ensure that licence conditions in bands currently used are as flexible as possible;	
RSPG recognises that the mechanism of possible compensation is a national issue. RSPG recommends that the commission assists the transition by providing early guidance to the relevant Member States, in particular clarifying cases where it would not be compatible with state aid rules.	
RSPG recognises that implementation of broadband PPDR networks is a national issue.	



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<p>RSPG notes 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). Therefore, RSPG recommends that the Commission liaises with ETSI and CENELEC to ensure that the new development in the 700 MHz band 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.</p>	



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Confindustria Radio Televisioni profile

Confindustria Radio Televisioni (CRTV) is the association representing the Italian radio and television industry. Established in June 2013 and operating since autumn of the same year, for the first time it gathers all the major broadcasting operators, both public and private, local and national, TV and radio, representing 98% of the market with over 29.000 employees. The Association was founded by Rai, Mediaset, Sky, La7, Telecom Italia Media and FRT, the Federation of local radio and TV operators. The founders were later joined by other TV operators: Digicast, Discovery Italia, Giglio Group, Prima TV, QVC, RTL 102.5, Rete Blu, Viacom International, LT Television, Radio Italia, and, more recently by HSE24 and satellite platform operator Tivù. Associate members include DNG-Digital News Gathering and satellite operators SES Astra and Eutelsat Italia.

The Association participate in the larger Confindustria network (Italian National Association of Entrepreneurs).

Overall CRTV members represent over 90% of the broadcasting market, with revenue of about 9 billion euros and 26.000 direct employees (up to 80.000 taking into account indirect workforce - CRTV 2013 estimates).

CRTV's goal is to represent the broadcasting industry as a whole at institutional, legislative and contractual level. CRTV collaborates on a regular basis with all relevant national ministries, institutions and regulators as well as UE and international organizations and institutions with the objective of securing and promoting the development of the radio and TV industries based on fair competition, equal access and respect of users' rights.

More information and the full Members list are available on CRTV web site www.confindustriaradiotv.it.

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