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Radio Spectrum Policy Group – Secretariat
DG CNECT B4: Spectrum – Office: BU33 7/55
European Commission, B-1049 Bruxelles, Belgium

Vienna,

2015-01-12
ORS/Recht/SK/ho

Response to the 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” and on the consultation on the “Draft RSPG Opinion on Common Policy Objectives for WRC-15””

Dear Madam/Sir,

please find below a response to the 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” and on the consultation on the “Draft RSPG Opinion on Common Policy Objectives for WRC-15” from Austrian Broadcasting Services (ORS).

ORS appreciates the position adopted with regard to the long term sustainability of DTT in principle, specifically the recommendation that the frequency band 470-694 MHz shall remain available for DTT in the foreseeable future, i.e. 2030. But we think, that in order to ensure planning security and due to the fact that the broadcasting sector requires long-term investment, it should be clarified that this band shall remain for DTT at least until the year 2030, ideally even beyond. Therefore ORS disagrees with the introduction of a co-primary allocation to the mobile sector at WRC-15. We think that this would have very negative impacts on DTT.

Furthermore ORS is of the opinion that 2020 and 2022 are too early to be considered as deadlines for the completion of the 700 MHz clearance process, as the detailed planning / co-ordination process has not been determined yet. However, if mobile allocation should occur earlier, we think, that it should be ensured, that this won't happen prior to the expiration of the relevant licenses. With regard to ORS the current licenses will expire in 2023. In our opinion there should also be a financial compensation for the replanning of infrastructure.

Regarding the WRC-15 Agenda Item 1.2, ORS considers it important that the definition of the harmonized technical conditions of the 700MHz band and the rules of the cross border coordination shall ensure the protection of broadcasting services below 694MHz, in particular as far as channel 48 is concerned.

Yours sincerely

Austrian Broadcasting Services


Mag. Michael Wagenhofer
Managing Director


DI Norbert Grill
Managing Director