



TELEWIZJA POLSKA

Ośrodek – TVP Technologie

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RSPG Secretariat
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Response 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

Telewizja Polska S.A. (TVP) – Polish Public TV Broadcaster – would like to welcome the opportunity to comment on the draft *The Draft RSPG Opinion on a long-term strategy on the future use of the UHF band (470-790 MHz) in the European Union*.

The UHF band remains crucial for digital terrestrial TV and PMSE services auxiliary to broadcasting. Therefore it is of highest importance to protect the band in order to secure the delivery of free-to-air audiovisual content and thus fulfil the obligations imposed on Member States and Public Broadcasters.

Below you will find our view on most crucial issues concerning the future of the UHF Band.

The band 470-694 MHz

The band 470-694 MHz shall remain allocated to broadcasting service in the foreseeable future i.e. at least until 2030. TVP supports RSPG recommendation 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/free-to-view television and the various political, social, cultural and economic general interest objectives when this is achieved entirely or partly through the DTT platform, should be taken into account”*.

As far as the RSPG recommendation that Member States should have the flexibility to use the 470-694 MHz band for wireless broadband downlink (WBB) is concerned, TVP would like to stress that this cannot in any way affect or constrain current DTT operation and its future evolution. Therefore applicable regulatory measures shall be applied by WRC-15 (see our position on *The Draft RSPG Opinion on Common Policy Objectives for WRC-15*).

The 700 MHz band

Reallocation of the 700 MHz band to mobile service will have very serious and negative impact on DTT. In case of Poland additional constraints would result from cross-border frequency coordination. Therefore any clearance of the 700 MHz band shall be no earlier than in 2025.



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PMSE

PMSE plays crucial role in TV production. TVP shares the RSPG view that there is a need to have technically appropriate and sufficient spectrum for PMSE and therefore there could be a need to identify additional spectrum. Such additional spectrum for PMSE shall be made available well in advance of the deadline for the release of the 700 MHz band. Furthermore, long term certainty should be provided for the additional PMSE spectrum in order to facilitate investments in the necessary research and development, as well as migration of the PMSE users out of the 700 MHz band.

PPDR

Implementation of PPDR services in the UHF band shall not impose limitations on current use and future development of DTT. Therefore adequate measures shall be taken in order protect broadcasting service from harmful interference from PPDR.