



**RTÉ response to 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”**

January 2015

1. Introduction

RTÉ, Ireland's primary Public Service Broadcaster, welcomes the opportunity to comment on the work of the RSPG.

RTÉ is the primary user of the UHF spectrum in Ireland, and has been investing in and delivering national public service television using UHF spectrum since the 1970s. Today, RTÉ's free to air Digital Terrestrial Television (DTT) platform SAORVIEW is delivered exclusively over UHF spectrum and is entirely dependent on it. DTT in the UHF band provides universal, free to air access to public service media services that seek to inform, educate and entertain Irish citizens, and contributes significantly to media pluralism.

SAORVIEW can be received in over 98% of Irish Households and by some 56% of households in Northern Ireland¹. About 96% of all households on the island of Ireland are able to access Irish television via DTT² without a contract, subscription or monthly bill. SAORVIEW makes Irish language programming available without subscription to more households than ever before. In just over two years since the analogue switch off in October 2012 SAORVIEW has been adopted by 41% of Irish households³ and continues to grow.

As such the UHF spectrum currently used by broadcasting is a matter of national cultural, social, and economic importance.

2. Comments on Section 9 - The Opinion of the RSPG

RTÉ does not support a hasty transition in the 700MHz, and suggests that the transition should be timed to minimise disruption to existing TV viewers, particularly where the real need for additional WBB spectrum has yet to materialise.

RTÉ supports the later date of 2022 as the earliest deadline for making the band available for ECS.

While RTÉ does support national measures to facilitate transition to more spectrum efficient technology, we would not support any mandated early move to DVB-T2 or HEVC as it is not necessary in some countries where demand for spectrum (both DTT and WBB) is sufficiently low.

RTÉ supports the recommendation to maintain the 470 to 694MHz band for downstream

¹ Ofcom Digital Switchover Factsheet 4, June 2012

² Combined coverage from SAORVIEW in Ireland and Northern Ireland and Irish services (RTÉ One, RTÉ Two, and TG4) available on Freeview in Northern Ireland.

³ 620,000 Irish DTT households, Nielsen, January 2014. Of those 161,000 are SAORVIEW only homes.

audiovisual content distribution beyond 2030.

RTÉ supports the recommendation that the 470 to 694MHz band should remain available for DTT for the foreseeable future, and suggests beyond 2030.

RTÉ does not support flexibility to use the 470 to 694MHz band for WBB downlink, as compatible systems have yet to emerge and demand for additional WBB downlink spectrum in this band has yet to be sufficiently proven.

RTÉ agrees with the recommended criteria for consideration with respect to DTT in the 470 to 694MHz band.

RTÉ supports the recommendation for flexible licence conditions for PMSE use.

RTÉ would welcome guidance from the commission with respect to compensation.