

Comments of the Latvian Administration

on public consultation of the Draft RSPG Opinion on the long-term strategy on the future use of the UHF band (470-790MHz) in the European Union (doc. RSPG14-585(rev1))

Latvian Administration provides its comments 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 (doc. RSPG14-585(rev1))* (further – Draft Opinion) submitted to public consultation.

Our comments relate to the chapter 9 of the Draft Opinion, in particular, to the terms proposed for deadline. We numbered the chapter's bullet points in a consecutive order in our comments.

1. Latvian Administration has no comments on *bullet points 7 to 12*, proposing the future long term usage of the 470 – 694 MHz band for DTT and PMSE at least until 2030.

2. Supporting in general future use of WBB in the 700 MHz band, *bullet points 1 and 2*, the Latvian Administration suggests finding more country dependent and flexible approach when defining deadline for making the band available for effective use for ECS. Freeing-up of the band from DTT will be possible if the remaining transmission recourse allows continuation of the DTT service without deterioration, e.g., reduction of transmitted content, covered areas or limiting future developments of DTT. As the switchover to digital television was done in 2010, the introduction of the more advanced technologies, e.g. DVB-T2, is not planned until 2022 due to the related social and economic risks.

Regarding the development of DTT in Latvia, currently all planned UHF spectrum (470-790 MHz) is in use, resulting in seven layers in operation. Migration of DTT to the lower 470-694 MHz band necessarily requires replacement of the DTT technology since coordination of additional new channels for the DVB-T technology is not possible due to compatibility issues.

Transition timing from DVB-T to more advanced transmission systems, presumably different among Member States, should be taken into account when defining the deadline.

In general, due to differences among Member States, comprising level and trends of the DTT development, duration of existing licences, costs that are not amortised and other material issues, market demand and developments in bordering non-EU countries should be taken into account. Member States should exercise more flexibility and freedom when deciding the most reasonable term for changing the use of the band.

3. Deadline for making the 700 MHz band available for effective use for ECS.

In the *bullet point 3* two versions, 2020 and 2022 are proposed as binding deadlines for making the 700 MHz band available for effective use for ECS. Latvian Administration, taking into account situation in the country and experience gained from the 800 MHz process, considers the proposed term 2020 for a unique deadline in the EU as premature and unrealistic for Latvia and, possibly, for a number of Member States.

Other proposed term 2022 in our opinion could not be considered as a final deadline for all Member States as well, including Latvia. Latvia most probably will not be able to comply with this term.