

Dear Sirs,

Concerning public consultation of Draft RSPG Opinion on a long-term strategy on the future use of the UHF band (470-790 MHz) in the European Union, we would like to present the Bulgarian position, as follows:

In Bulgaria, the UHF band 470-790 MHz is currently used for DTT and for national security purposes. In the frequency band 700 MHz (694 - 790 MHz), which is set for release for IMT, there are existing assignments for TV channels. The band is used by multiplex-operators and their rights of use are provided until 2025.

The DTT was launched in Bulgaria in 2013. DTT transition on some new standard, different of DVB-T (i.e. DVB-T2, HECV or new), will effect operators and DTT users again on point of view of expenses.

The cross-border coordination to reallocate new broadcasting assignment in order to enable migration of DTT in the band below 700 MHz is long and complicated process with unpredictable outcome coordinating countries.

In Bulgaria, part of the defense systems use the frequency band 700 MHz. The migration and re-allocation in short time require significant finances and this will be difficult for Bulgaria.

In this regard, in our view deadlines set for 2020 - 2022 are too short and therefore, it seems appropriate to fix a longer transitional period, thus, reflecting national circumstances.

Best regards,

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