

# POSITIONSPAPIER

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## **VPRT's comments on the draft RPSG Opinions on "a long-term strategy on the future use of the UHF band (470-790 MHz) in the European Union" and "Common Policy Objectives for WRC-15"**

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The Association of Commercial Broadcasters and Audiovisual Services in Germany (VPRT) represents the interests of approximately 140 companies operating in the fields of commercial television, radio and multimedia. A vital technical prerequisite for innovation and development in the broadcasting sector is a reliable access to infrastructure. Consequently, the future spectrum policy is of utmost importance for our members. We therefore welcome the opportunity to comment on the "Draft RPSG Opinion on a long-term strategy on the future use of the UHF band (470-790 MHz) in the European Union" and the "Draft RSPG Opinion on Common Policy Objectives for WRC-15". VPRT has been actively participating in the German discussion and consultation process on spectrum policy. We generally support the RSPG approach but would like to take the opportunity to comment on some key aspects.

- In Germany the broadcasting sector has agreed to migrate from DVB-T to DVB-T2 in order to meet consumer demand for higher resolution content formats. For a successful transition to DVB-T2, the 700 MHz band is essential for a temporary simulcast. From a German broadcasting perspective, TV access to the 700 MHz band needs to be safeguarded at least until 2020. However, the migration is a complex process and needs to take cross-border coordination into account. As we understand that in other member states more time might be needed, it seems still too early to set 2020 or 2022 as a fixed deadline for making the band available for WBB at European level at this stage.
- VPRT welcomes that RSPG recognises, in its draft opinions, the importance and special characteristics of DTT as well as the necessity of regulatory clarity and a high level of certainty for broadcasters to make long term investments in new technologies and services. We welcome that RSPG therefore "recommends that the frequency band 470-694 MHz shall remain available for DTT

in the foreseeable future, i.e. 2030.” However, in order to avoid the interpretation that 2030 is the suggested end date /deadline of DTT, we recommend to clarify that the frequency band is *at least* available until 2030 for DTT. In this context we also welcome RSPG clear recommendation for the WRC-15 to “support no mobile allocation in the band 470-694 MHz” and the clear call for “ensuring protection of the broadcasting service below 694 MHz.”

- We are, however, sceptical about the recommendation to give member states the flexibility to use the 470-694 MHz band for WBB downlink. DVB-T2 is currently the most efficient technology. The 470-694 MHz band needs to be exclusively protected for broadcasting. Furthermore mobile operators should be strongly encouraged to transmit in all networks to more efficient standards and make their own contribution to the digital dividend.
- VPRT welcomes that RSPG is addressing the question of compensation and supports the idea of clear guidance for the member states. The Lamy report gives comprehensive indications on this point. In this context, we would like to recall that broadcasters contributed with high investments to more efficient standards to the digital dividend. The additional costs of the clearance of the 700 MHz Band, however, should not be borne by broadcasters.