

European Commission
Radio Spectrum Policy Group-Secretariat
DG CNECT B4: Spectrum Office: BU33 7/55
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Belgium

Only by e-mail: CNECT-RSPG@ec.europa.eu

BNE comments on the update of the RSPG Work Programme “2014 and beyond”

Dear Sirs,

Broadcast Networks Europe (BNE)¹ welcomes the opportunity to comment on the RSPG Work Programme “2014 and beyond”. Please find our comments attached.

Yours sincerely



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¹ Broadcast Networks Europe (BNE) is a trade organisation for European Terrestrial Broadcast Network Operators. BNE currently has 16 members with operations in 22 European countries. Members are Abertis (Spain), Arqiva (UK), České Radiokomunikace (Czech Republic), Digea (Greece), Digita (Finland), ETV (Serbia), Elettronica Industriale (Italy), Norkring (Norway), Oiv (Croatia), ORS (Austria), Swisscom Broadcast (Switzerland), Radiocom (Romania), Rai-Way (Italy), RTENL (Ireland), TDF (France) and Teracom (Sweden). In addition Terrestrial Network Operators in Belgium, Germany, Estonia, Hungary, Monaco and Denmark are represented by their respective parent (and BNE member) company.

1. Long-term strategy on the future of the UHF band in the EU

The long term strategy for the UHF band is intimately connected to the Agenda points 1.1 and 1.2 at the forthcoming WRC15.

In BNE's opinion there is a slight timing disconnect between the scheduled timing for the WRC-15 preparation activity and timing of the RSPG Opinion on the Long Term Strategy. In particular we believe that the output from the Long Term strategy work should be a key input to the WRC-15 preparation activity and hence should be available to inform this activity.

BNE would also encourage the RSPG to outline in its work programme the steps it intends to take to develop its final Opinion to be delivered end 2014/beginning 2015, in particular whether there will be a phase of this activity that will involve direct stakeholder engagement, the preparation of a draft Opinion and subsequent consultation earlier in 2014.

As the long term strategy also includes the 700 MHz band, WBB implementation issues should also include realistic scenarios on how a possible forced migration of current DTT networks based on DVB-T1 to DVB-T2 and enhanced compression technologies, could be conducted including not only technical issues but also consumer impact, financial aspects, timing considerations and compensation to network operators.

2. Efficient awards and use of spectrum bands harmonised for Electronic Communications

No Comment.

3. WRC-15 preparation (common policy objectives for WRC-15)

BNE believes that the Opinion delivered from the Long-term strategy work should be available to serve as an input for the WRC15 preparations, hence as noted above against item 1, the timing of the output from the "Long Term Strategy Opinion" should be adjusted to inform this activity.

4. "Good offices" to assist in bilateral negotiations between EU countries

BNE supports the work item and has no further comments

5. The review of the Radio Spectrum Policy Programme

Broadcast Networks Europe considers that in the development of the next Radio Spectrum Policy Programme terrestrial networks should be afforded appropriate weight and priority in the Digital debate. Terrestrial networks are, in most EU countries, the only platform where free-to-air public service channels are broadcasted unencrypted and without subscriptions and hence have a unique and central role in bridging the Digital Divide. Furthermore, BNE considers that vibrant Digital Terrestrial Television (DTT) service platforms are fundamental to sustaining competition and enabling low cost access to content for European citizens over the long term and hence should be at the centre of any long term plans for audio-visual content delivery and converged services.

We envisage a bright future for DTT in Europe with continued investment and innovation to support the migration to HDTV and to accommodate 3D and eventually UHD TV using the next generation of technology DVB-T2/HEVC. However, this will only be possible if the platform is afforded the appropriate certainty and access to spectrum over the long term with DTT at the heart of Europe's Digital Future.