

ARD/ZDF/DRadio Comments
on the
RSPG Opinion
on EU Spectrum Policy Implications of the Digital Dividend

German public service broadcasting organisations ARD, Deutschlandradio (DRadio) and ZDF welcome the opportunity to comment on the RSPG Draft Opinion on EU spectrum policy implications on the digital dividend.

For the most part, ARD, DRadio and ZDF support RSPG's analysis of the RRC-06 results, RSPG's acknowledgment of the possibility of using broadcasting spectrum for other multimedia services, and the assessment regarding harmonisation of a possibly available digital dividend.

Compared to the RSPG Draft opinion, we nevertheless take a more critical view regarding any suggestions to use the GE-06 UHF band for mobile communications services offering the distribution of multimedia services and also requiring a return channel. It is our explicit view that there is a lack of sufficient capacity in the frequency range of 470 MHz to 862 MHz for the required spectrum, including guard bands between the considered downlink for mobile broadcasting services and the uplink channels. ARD, DRadio and ZDF are also convinced, that such a development would lead to a less efficient utilisation of the broadcast spectrum, thus considerably endangering the realisation of the requirements of digital broadcasting including multimedia services.

Please find below a detailed explanation of the points on which ARD, DRadio and ZDF diverge from the RSPG draft opinion:

1. "Primary mobile allocation in the UHF broadcasting band"

- After the very successful planning results of the Radio Communications Conference 2006 (RRC-06) for Germany and other EU Member States, broadcasters and network operators are facing difficult challenges in regard to the speedy implementation of the new digital plan agreed 2006 in Geneva (GE-06 Plan). With the introduction of digital radio in Band III, the introduction of DVB-T in Band IV/V, and the plans for mobile broadcasting using T-DMB and DVB-H, very ambitious targets have been set for the years ahead. As a result, the available spectrum is exhausted to a great extent, and it seems hardly possible to allow for further primary mobile telecommunications services within the GE-06 spectrum without endangering the implementation of these targets.
- In recent years, ARD, DRadio and ZDF have invested heavily in the digitalisation of broadcasting, and have thus realised a significant increase in efficiency in the utilisation of spectrum. Sales figures of over six million DVB-T receivers in Germany during the last three years demonstrate the weight of a commercial factor in the digitalisation of television, and the success of the DVB-T concept, which builds on an increase of the number of programmes that can be received terrestrially. This extended programme

offer, in turn, is an indispensable part of the motivation to buy a DVB-T receiver, which can be made possible only through sufficient broadcasting spectrum and its more efficient utilisation in the course of digitalisation.

- Germany's geographical position in the middle of Europe, with ten neighbouring countries, means that it has less frequency resources available than other, less centrally situated European countries (for example the UK). Furthermore, regional offers and local programmes are a basic element of the federal structure of broadcasting in the Federal Republic of Germany, and must be taken into consideration accordingly in the utilisation of the frequency resources. In addition, a part of the DVB-T coverage contained in the GE-06 Plan, consisting of channels above 60 (Ch 61 – 63, 67 – 69), is not usable at present in Germany, since it is in use for military applications and will still remain so for an indefinite time. Military applications also impose a power limitation on broadcasting on VHF channel 12 which hinders the introduction of digital radio. In Germany, plans already exist in regard to modifications to GE-06 Plan entries with a view of taking into account mobile broadcasting (T-DMB and DVB-H). These considerations relate to modifications of plan entries for DVB-T in the VHF range towards T-DMB uses, and to alter allotments for DVB-T in the UHF range in such a way that they can be used for DVB-H in densely populated areas. In addition to an already existing lack of resources there is a need of frequencies for the Services Ancillary to Broadcasting/Production (SAB/SAP services), which are confined to secondary usage in the UHF band.

There are thus several framework conditions that clearly indicate that there will not be sufficient additional frequency spectrum for IMT-2000 and/or mobile telecommunications applications in the UHF band of the GE-06 Plan in Germany. Furthermore, given a long-term transition from GSM to UMTS, the GSM-900 frequencies could be utilised for the provision of IMT-2000 services in rural areas, which will take into account the need for IMT frequencies for cheap, wide-area mobile telecommunications coverage below 1 GHz.

Given the possibility to use both DVB-H and T-DMB transmission systems in the GE-06 bands, a mobile primary allocation in the UHF range in question for "mobile broadcast" is not required.

2. "Harmonisation"

The RSPG Draft Opinion on the Digital Dividend describes advantages of harmonisation of parts of the GE-06 spectrum band for mobile telecommunications and mobile broadcast. ARD, DRadio and ZDF object to such efforts for harmonisation, as they would result in considerable costs and disadvantages for traditional broadcasting as well as mobile broadcasting:

- The RRC-06 Planning Conference, successfully finalised this year, represents the culmination of six years of intensive preparatory work, costing several hundred million Euros. The present implementation of the GE-06 Plan again involves intensive work effort and high costs. Any further planning conference in 2010 to 2012 for harmonisation of a digital dividend,

as suggested by the RSPG, would create considerable further expenditure for the preparation and execution of the conference, including resulting costs for the modifications in the networks, none of which would be economically viable.

- The present GE-06 Plan permits the utilisation of DVB-H in the entire UHF frequency range and of T-DMB in the VHF band, as well as combinations of DVB-T and DVB-H or T-DMB and T-DAB in one multiplex. Harmonisation, i.e. restriction to certain TV channels for DVB-H in the UHF range, would narrow down the usable spectrum resources for “mobile broadcast” to a greater extent than is sensible or necessary.
- Because most countries have entries in the GE-06 Plan for portable DVB-T reception, DVB-H for mobile broadcast services can be introduced with no major limitations in the course of the digitisation of television broadcasting, as confirmed by the successful DVB-H transmissions in Germany and Italy.
- The implementation of the GE-06 Plan, and with it the digitalisation of analogue television, will not be finished in most European countries before 2012. Therefore, any dividend that may be available in the future could be harmonised only well after 2012. Considerable doubts remain whether, at that time, the desired advantages for “mobile broadcast” services could be realised, as these depend on immediate introduction.

ARD, DRadio and ZDF are not convinced by RSPG’s reasoning on this matter, as the advantages of harmonisation of a possible spectrum dividend for “mobile broadcast” applications are not apparent. Also high expected expenses, intensive additional work effort and inevitable delays can hardly be justified.

A final statement on the possible use of a digital dividend, if any, and on the usefulness of a harmonisation for IMT-2000 is possible and meaningful only after successful digitalisation of television with DVB-T and radio with T-DAB and the introduction of DVB-H and T-DMB for mobile broadcast services.

Brussels, December 15th 2006

For further information, please contact:

Eva Majuntke
Acting Head
ARD Liaison Office Brussels
Rue de la Loi 223-225
B-1040 Brussels

Telephone: +32 (0)2 282 1653
Fax: +32 (0)2 230 4434

E-Mail: eva.majuntke@wdr.de

Pascal Albrechtskirchinger
Head
ZDF Europe Office
Rue Wiertz 50
B-1050 Brussels

Telephone: +32 (0)2 286 9130
Fax: +32 (0)2 286 9136

E-mail: zdf.albrecht@ebu.ch