

RTÉ Response to the
RADIO SPECTRUM POLICY GROUP
Draft Opinion on
EU Spectrum Policy Implications of the Digital
Dividend

15th December 2006

Introduction

RTÉ, Ireland's national Public Service Broadcaster (PSB), welcomes this opportunity to participate in this Response to the Radio Spectrum Policy Group's (RSPG) draft Opinion on "EU Spectrum Policy Implications of the Digital Dividend".

Discussion

RTÉ and RTÉNL's Frequency Planning experts wish to state some of the following observations:¹

- Public Service Broadcasting exists to ensure cultural diversity, media pluralism and balanced information and debate in society. RTÉ believes that the fundamental democratic principle of ensuring social inclusiveness as demonstrated by a 'one-to-many' (or point to multipoint) broadcast paradigm will continue to be important for citizens and for policy makers, and that this principle must be safeguarded even more so in this era of convergence and technological complexity. In addition, Public Service Broadcasters have the obligation to achieve as near as possible "universal coverage": it should be noted in this regard that to achieve this near-"universal" coverage requires significant allocations of spectrum.
- The safeguarding of Public Service Broadcasting, and the delivery of content by PSBs via other platforms, must remain a priority for policy makers into the future, as the requirement for spectrum for High Definition Television and other new and emerging technologies indicates. It is, therefore, only in the context of safeguarding spectrum allocations for public service broadcasting as a priority that the use any spectrum dividend should be considered.
- During the switchover transition period, which for the EU members is agreed to end by 2012-2015 in the UHF and VHF bands (for some countries the transition period in the VHF band is prolonged until 2020), protection of analogue broadcasting services remains the absolute priority.
- Digital broadcasting transmissions comprise a more efficient use of radio spectrum than analogue transmissions, and this, together with advances in compression technologies, theoretically suggests that some spectrum could be released, after analogue switchover, to other uses. According to the RSPG opinion the term "digital dividend" is defined as "the spectrum made available over and above that required to accommodate the existing analogue television services in a digital form in the VHF (Band III) and UHF (Bands IV and V)." RTÉ, however, suggests that the realities and exigencies of broadcasting today, in an era of genuine convergence, mean that the extent of such a potential "dividend" needs to be carefully analysed, as public service broadcasting services should be considered a priority as part of the democratic

¹ Note some of these points re-iterate those stated in our Response to the Radio Spectrum Policy Group's (RSPG) Opinion on the introduction of multimedia services in particular in the frequency bands allocated to the broadcasting services, July 2006.

obligations of EU Member States. With HDTV now a reality in Europe, provision must be made for HD services in the UHF and VHF bands for public service broadcasting purposes.

- The RSPG draft Opinion on “EU Spectrum Policy Implications of the Digital Dividend” identifies possible forms which this “digital dividend” may take in European countries, covering both broadcasting and electronic communications services. RTÉ, along with its colleagues in the EBU, would caution that part of the digital dividend may be required to improve the coverage of any digital services which are provided during the transition phase to analogue switchover. In addition, European Member States have acknowledged the high demand for broadcasting services in their submissions to the Geneva RRC '06 conference, and in their responses to the recent RSPG questionnaire also. Inevitably, different countries have different needs and therefore a “pan-European” digital dividend will not necessarily materialise, due to the differences in each Member State in terms of spectrum use.
- “Digital dividend” therefore, will be specific for each country; it depends on the current position of the terrestrial broadcasting platform and on its future development in that territory. It is also possible that in some locations no, or very little, “digital dividend” might actually materialise when ever-growing public demand for higher quality (HDTV) and mobility (DVB-H, T-DMB) services for Public Service Broadcasting over the longer term are taken into account.
- “Harmonisation” of this “digital dividend” across all the planning areas, therefore, may be difficult to achieve, as this would require a co-ordinated strategy for the analogue-to-digital switchover across all geographies. Even CEPT countries are approaching this complex task according to the demands and traditions of the local market, existing broadcasting infrastructure, financial and technological resources, and according to different timescales in different areas.
- In many areas of this spectrum dividend discussion, and arising from the deliberations of RRC '06, it is apparent that further studies are urgently required in terms of the implications of sharing spectrum between broadcasting and other services, such as fixed/mobile services, before any decisions can be made in terms of releasing (or sharing) spectrum for these purposes.

In conclusion, RTÉ is of the view that there are potential opportunities for European citizens to benefit from a “digital” or “spectrum” dividend”, but equally is of the view that this is a complex enterprise and one in which the needs of public service broadcasting in Europe must be recognised as a priority in the first instance.

RTÉ, 15th December 2006.