

Radio Spectrum Policy Group – RSPG
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Comments from Yle to the Public Consultation on the Draft RSPG Opinion on a Radio Spectrum Policy Programme

Yle welcomes the opportunity to provide comments on the draft RSPG Opinion on a Radio Spectrum Policy Programme.

A. Facts about Yle

Yle, the Finnish Broadcasting Company, is Finland's national public service media (PSM) company. Finland is a very sparsely populated country, having the **lowest population density in the European Union**.

Yle operates three national television channels and six nationwide radio channels, complemented by regional radio stations. Currently, TV channels delivered over the broadcasting networks dominate the consumption of video content published by Yle. In addition to its TV and radio channels, Yle publishes linear video and audio, and VOD and AOD content through online services. See more details <https://yle.fi/aihe/artikkeli/about-yle/this-is-yle>.

Yle's operations are financed by a public broadcasting tax. The company is supervised by an Administrative Council, appointed by the Parliament of Finland.

Yle has a legal obligation to serve the entire Finnish audience with diverse audiovisual and other content. Our legal remit means that the **entire Finnish audience need to have access to the full selection of our media content**.

B. Yle's views on the changing consumption and delivery of audiovisual media

B.1 Internet publishing will become our main publishing platform

We expect the share of linear video and VOD viewing through our online services to increase significantly in the future. In addition to changing user preferences, changes in the device base for video consumption are also leading to changes in video consumption. The number of video consumption devices without a broadcasting receiver has already exceeded that of devices with a broadcasting receiver. We estimate that the share of video content viewing through IP-enabled screens will, over time, surpass viewing through broadcasting receivers.

We foresee that internet publishing will become the main publishing platform of our company by approximately 2025. During the coming years, the decisive

battle for audience attention will take place on the internet, not in broadcasting networks.

Even though the linear prescheduled channels through broadcasting networks will still bring the majority of viewing and listening minutes for several years, the broadcasting delivery will gradually move to a limited role, **as a major part of Yle's content will not be available through broadcasting networks**. In terms of radio network technology, this means that the high-power high tower downlink-only DVB-Tx or 5G **broadcast networks on sub-700 band cannot serve the Finnish audience sufficiently**, as Yle's entire content selection cannot be reached through broadcasting networks.

Yle needs to secure the availability of the full content selection for the entire audience through fixed and mobile broadband networks during the peak viewing moments. The key challenge is to secure the **wireless broadband capacity during the peak viewing moments in rural and sparsely populated areas**.

B.2. Development of Yle video publishing and content delivery

Internet publishing platforms and content delivery over fixed and wireless broadband networks will replace the role of the broadcasting tv-channels as Yle's primary video publishing service. Yle's video offering will contain several publishing formats, which will all be available only through our internet publishing platforms. **Pre-scheduled tv-channels over broadcasting networks do not contain the complete public service media content**, which needs to be available for the entire audience:

1) Pre-scheduled tv channel as a publishing format will remain beyond the foreseeable future.

- The number of pre-scheduled tv channels will decrease
- Pre-scheduled tv-channels will be integrated more closely to internet publishing

2) Non-pre-scheduled live video streams will develop as a more important part of Yle's content offering.

3) The viewing share of the video-on-demand catalogue and catch-up publishing will increase further.

In addition to the above, new publishing formats for broadband delivery may also evolve over time.

B.3 Open internet delivery over the best effort networks is "the new normal" for media delivery

The peaks of live video viewing will remain or perhaps even increase, so the risk of insufficient capacity of broadband networks will exist, especially in mobile networks in rural areas.

Currently, the broadband subscribers are paying the costs of linear tv-channel and VOD delivery over broadband networks. The **substance of traditional**

free-to-air (FTA) -access has changed to “non-surcharge access” or “free at the point of use”, i.e., PSM content and other **public services are available through open internet, upon the condition that the audience and citizens pay for their broadband subscriptions, as they pay their electricity bills.**

Broadband publishing allows more publishing formats and a larger number of programme titles for different target groups than broadcasting publishing. This means that broadband publishing and distribution enable more diversity than broadcast distribution. The broadband publishing market is also more competitive than the broadcast publishing market, and more competition creates better quality content for the broadband publishing market.

B.4 Yle's proposal to the Finnish Government in September 2020

Yle presented the above views to the Finnish Minister of Communications in September 2020 (see the English translation

https://drive.google.com/file/d/1G0BHqn22bl5V5s_bbiuQKUfO7tYatwJW/view?usp=sharing). Our key message was as follows: Provided that the availability of

Yle's content for the entire audience through broadband networks will be secured, the sub-700 -band can be allocated to 5G networks.

Ministry of Transport and Communications stated in its national negotiation position for the WRC23 agenda item 1.5., in February 2021, as follows (unofficial translation by Yle):

Excerpt from the reasoning of the national position:

“The co-primary mobile allocation for the band 470 - 694 MHz or for part of the band would enable more flexible use of the band in future. The national decisions on the use of the band in the future, in Finland, will be made, having as a goal, among others, **to also secure the supply of tv-content for the entire audience during the peak tv-viewing moments.**”

The position of Finland:

“Finland supports the co-primary mobile allocation and IMT identification for the band 470 - 694 MHz or for part of the band.”

C. Yle's comments on Draft RSPG Opinion on RSPP

C.1. Section "3.4. Broadcasting and PMSE" of the Draft

We understand that RSPG plans to exclude the future of broadcasting and PMSE in regard to the UHF Band 470-694 MHz from the new RSPP. Based on that decision, we cannot see why the Draft includes a reference and a footnote to the Decision EU 2017/899, while the same Decision is discussed in section 6.6.

We propose that the reference to Decision EU 2017/899 should be removed from section 3.4.

C.2. Section "6.6. Audio-visual Media Policy" of the Draft

Based on section B above in this document, we propose the final RSPG Opinion to include a new goal setting:

"The entire audience should have access to the full selection of audiovisual media content. This requires that the entire audience need to have access to audiovisual media content through broadband networks, also during the peak moments of tv viewing. Since only part of that access can be made available through fixed broadband networks, sufficient spectrum needs to be available for the wireless broadband networks, especially for 5G. For rural and sparsely populated areas this means requirement for additional spectrum below 1 GHz for these networks, noting that the 900 MHz, 800 MHz and 700 MHz are already harmonised for that purpose."

C.3. Audiovisual media delivery through broadband networks as a tool to achieve the Digital Decade -goals

Our above proposal C.2. for section 6.6. is primarily based on the needs of the audiovisual media services. Our proposal also supports the goals which the EU Commission released on 9.3.2021, in the communication "2030 Digital Compass: the European way for the Digital Decade". The defined goal for the digital infrastructure, "By 2030, all EU households should have gigabit connectivity and all populated areas should be covered by 5G.", requires both supply of broadband networks (i.e., investments) and demand for broadband subscriptions.

A well-managed and planned transition of media content delivery from broadcasting to broadband networks creates a demand for high-speed broadband subscriptions, thus justifying the needed network investments. The audiovisual **media delivery through broadband** networks can, in this way, act also as **a tool** for European governments **to achieve the Digital Decade -goals**.