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ORS/SK/NZ

Response to RSPG Opinion on a RSPP G21-014 FINAL

Dear Sir or Madam,

the ORS-Group ("ORS") with its Austrian-wide broadcasting network, provides services to a large number of TV and radio providers. ORS' service portfolio comprises among others dissemination of radio and television programs via terrestrial transmission facilities. ORS is the operator of several nationwide as well as regional DVB-T2 multiplex platforms. Alongside public service broadcasting, private broadcasters use this infrastructure to deliver content of democratic, social and cultural value to Austria´s citizens. Terrestrial broadcasting provides a broad range of tv channels, is easily accessible and reliable and therefore plays a vital role in Austria´s Media ecosystem.

In this context we want to highlight the importance of the frequency band 470-694 MHz for providing a low-threshold access to broadcast as there is an enduring high demand of terrestrial TV and radio, which will – despite the rising non-linear consumption – not change in the next decade and beyond. A recent research carried out the University of Salzburg and mediareports forecasts, that two thirds of the total audiovisual consumption in Austria in in the year 2030 will still be linear television.

Furthermore, distribution technologies, like "5G-Broadcast" supplement the well-proven DVB-T2 technology and enable new use cases. With 5G Broadcast TV and radio will be accessible even via Smart Phones, Tablets and other mobile devices and in self-driving cars. Convergence between 5G broadcast networks and 5G mobile broadband networks will lead to new business models and a future-proof terrestrial distribution platform for enhanced media services (linear and non-linear).

Therefore, we welcome the Draft Opinion of the RSPG concerning **section 3.4.** insofar as the allocation of the frequency band 470-694 MHz to broadcast is explicitly emphasized, which, we believe, should be maintained well beyond 2030. In the past, there have been repeated shifts of frequency allocations in favor of mobile communications. A further shift would make it impossible for the broadcast and culture industry to fulfill their purpose. The broadcasting industry guarantees the most efficient use of the multiplexes and layers for digital terrestrial television and radio transmission. A further reduction of the broadcast spectrum would result in a loss of broadcasting services and media diversity, which is not acceptable.

In this regard the ORS-Group underlines the unchanged need for broadcasting spectrum in Austria for the upcoming years (2030 and beyond) and encourages RSPG to preserve the existing broadcast allocations ("NO Change").

Further, a relocation of broadcasting spectrum would affect PMSE services and their use within the sub-700 MHz frequency bands adversely. This would lead to a significant reduction of the quality standards currently in place for the majority of PMSE services, as well as substantial switchover costs.

Concerning **section 6.6.** ORS welcomes the Draft Opinion as the RSPG supports "*technology/service neutrality to accommodate new innovative applications while ensuring the EU population free access to linear broadcasting content over different platforms*", as using "5G Broadcast" besides DVB-T2 for terrestrial TV and radio distribution is a perfect example for technology/service neutrality within the broadcast technology/band. The parallel use of broadcast frequencies for DVB-T2 and 5G-Broadcast Standalone Downlink Only (both exclusively for media transmission) ensures the most effective use of frequencies via broadcast for a secure transmission of linear content.

Concerning **section 6.2.** we want to emphasize that terrestrial broadcast distribution has a significantly lower energy footprint than alternative distribution methods and is therefore advantageous when it comes to a climate change perspective[1]. This is why broadcast and multicast technologies could contribute to the reduction of the environmental impact of the information and communications technology (ICT) in general and broadcasting sectors in particular. We assume that 5G Broadcast would have an equivalent effect due to similarly conditions.

For further information please do not hesitate to contact us!

Sincerely yours,

Österreichische Rundfunksender GmbH & Co KG

Michael Wagenhofer
Managing Director

Norbert Grill
Managing Director

[1] See BBC study : https://www.bbc.co.uk/rd/blog/2020-09-sustainability-video-energy-streaming-broadcast