

EBU response to the public consultation on *The Draft RSPG Opinion on Common Policy Objectives for WRC-15*

The EBU welcomes the opportunity to provide comments on the draft *RSPG Opinion on Common Policy Objectives for WRC-15*.

The WRC-15 includes several agenda items which are of crucial importance for the future of broadcasting. In particular agenda items 1.1, 1.2 and 1.3 will affect the future use of the UHF band, 470-790 MHz, and the future use of the C-Band, 3400-4200 MHz.

In summary, the EBU:

- Supports the common policy objective that Member States should support no mobile allocation in the frequency band 470 - 694 MHz
- Is of the view that Europe should also support no mobile allocation in the frequency band 3800 MHz - 4200 MHz
- Supports the common policy objective regarding Agenda Item 1.2.
Furthermore, the EBU is of the view that any technical conditions applicable to a mobile use of the 700 MHz band (such as OOB emission levels and guard bands) should be specified in an ITU-R Recommendation to ensure that the risk of harmful interference to DTT services has been minimised. A reference to the Recommendation should be made either in a WRC-15 Resolution or in a footnote to the allocation in the Radio Regulations.

Further comments are provided below to address some specific elements of the common policy objectives proposed in the RSPG consultation document.

Agenda Item 1.1

In particular, Member States should:

- [...]
- “support no mobile allocation in the band 470 – 694 MHz”

The EBU strongly supports this objective.

We highlight a growing consensus in Europe that this frequency band should continue to be used for terrestrial TV services for the foreseeable future, at least until 2030. This consensus is supported by a number of studies that carefully considered all relevant strategic elements regarding the long term use of the band 470 - 694 MHz, in particular:

- Pascal Lamy’s report to the European Commission on the results of the work of the High Level Group on the future use of the UHF band (470-790 MHz),
- The ECC Report 224 on the *Long Term Vision for the UHF broadcasting band*,
- The study on *Challenges and opportunities of broadcast-broadband convergence and its impact on spectrum and network use*, by Plum and Farncombe for the European Commission,
- The Radio Spectrum Inventory,
- The draft RSPG Opinion on a long term strategy on the future use of the UHF band (470 – 790 MHz) in the European Union

The above mentioned reports recognise that the frequency band 470–694 MHz is essential for the delivery of audio-visual services that are both continuously innovating to provide better services to European citizens and are currently planning an increase in the number of programmes, an expansion of HDTV, additional mobility, and a possible introduction of Ultra High Definition TV. A co-primary mobile allocation of the frequency band 470 - 694 MHz at WRC-15 would seriously undermine the certainty that the broadcast industry needs for a next cycle of investments to achieve these plans.

- [...]
- *“also support, based on the RSPG Broadband Opinion, the worldwide identification of the following additional frequency bands for IMT:*

[...]

and

- *3400-3600 MHz*
- *3600-3800 MHz”*

The frequency range 3400 to 4200 MHz is currently used by broadcasters for programme contribution and programme distribution (including the backbone for DTT networks), nationally, regionally and globally. The use and locations of downlink receivers, used by broadcasters for distribution, are rarely registered as there is usually no requirement to do so. Therefore a global allocation to IMT in these bands will offer no protection to these broadcasters' operations.

Given the EC decision C(2014)2798 on 3400 to 3800 MHz and the impact on broadcasting of making this spectrum available to IMT, the remaining spectrum from 3800 to 4200 MHz is even more important to broadcasters. There is significant use of this spectrum within Europe, and, as is the case between 3400 and 3800 MHz, there is widespread use by broadcasters (including European broadcasters) of this spectrum outside Europe. In addition, as at WRC-07, there is support from many countries for no change in this frequency range.

Therefore Europe should not support a mobile allocation between 3800 MHz and 4200 MHz.

Agenda Item 1.2

“Under Agenda Item 1.2, Member States should:

- *support 694 MHz as the lower edge for the allocation to the mobile service on a co-primary basis with the broadcasting service and identification for IMT in the 700 MHz band, while ensuring protection of the broadcasting service below 694 MHz;*
- *ensure that no regulatory provisions in RR relevant to coexistence with broadcasting (co-channel, co-frequency and adjacent frequency) in addition to GE-06 agreement is adopted;”*

It is the EBU view that broadcasting services below 694 MHz should be protected from harmful interference from IMT, taking into account the GE06 Agreement.

In particular, any technical conditions applicable to the mobile use of the 700 MHz band (such as OOB emission levels and guard bands) should be specified in an ITU-R Recommendation to ensure that the risk of such harmful interference has been minimised. A reference to the Recommendation should be made either in a WRC-15 Resolution or in a footnote to the allocation in the Radio Regulations.

- *“ensure that there is no new provision which prohibits options for PMSE equipment”*

The regulatory context of this position is not clear and should be further developed. The EBU considers that both the duplex gap and the guard band in the 700 MHz band should be available for use by PMSE. However, even if both are taken into account, the spectrum available for PMSE in the UHF band will be insufficient to meet the future requirements. Therefore, additional frequency bands should be identified for PMSE use.

Agenda Item 1.3

“Under Agenda Item 1.3, Member States should support a revision of WRC-Resolution 646 providing relevant information on regional PPDR frequency ranges with no obligation on the use of specific technology and specific frequency band.”

In the event that PPDR services are implemented in the frequency bands adjacent to the broadcasting services, broadcasting should be neither subject to harmful interference from PPDR deployments nor subject to additional constraints in order to protect PPDR applications.

Agenda Item 10

“Member States should support a future Agenda item addressing the spectrum needs for the fifth generation of mobile networks (commonly known as 5G) with the focus above 6 GHz.”

It is the EBU view that a technical evolution of mobile services should include the possibility for a large scale delivery of media content in the future. 5G development is at the early stage and further studies are required before spectrum requirements can be defined.

Furthermore, it is necessary to review where there is a potential for more efficient use of spectrum already allocated to IMT. The need for additional spectrum should be assessed in the light of these findings and the substantiated future requirements.

The **European Broadcasting Union (EBU)** is a professional association of public service media organisations with 73 Members in 56 countries from Europe and beyond.

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