

7<sup>th</sup> January 2015

**Comments on  
(Draft) RSPG Opinion on Common Policy Objectives for WRC-15**

CRTV has the following comments on the Draft RSPG Opinion on Common Policy Objectives for WRC-15.

**WRC-15 Agenda Item 1.1**

CRTV considers essential to guarantee to digital terrestrial broadcasting an evolutionary path towards new generation networks in order to ensure to all European citizens an high quality free to air linear TV.

At WRC-15 any additional spectrum shall be identified not in detriment to the development of digital terrestrial broadcasting.

For this purpose CRTV supports broadcast to maintain the exclusive primary allocation in the band 470–694 MHz. To this purpose RSPG should recommend that the frequency band 470-694 MHz shall remain allocated on a primary basis exclusively for the broadcasting services in the foreseeable future.

This will guarantee the evolution of DVB-T towards new generation networks such as DVB-T2 with HEVC coding, that guarantees at least the transmission of HDTV and UHD TV programs in addition to a more efficient use of radio frequencies.

**Future WRC Agenda Items, WRC-15 Agenda Item 10**

CRTV agrees on the opportunity to promote European policies through action at future WRCs with the objective to promote European arrangements at a global level and the need to identify potential Agenda Items for future conferences early in the process, taking into account both the need to ensure long term consistency with EU policy and the possible connection to common policy objectives for WRC-15 Agenda Items.

For these purpose CRTV 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.

**Proposed modifications**

**(deletion, addition)**

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[...]

The RSPG Opinion on Wireless Broadband calls for a strategic plan that should include a detailed analysis of the usage of all bands preliminary identified as candidate bands (Annex 2 of that Opinion), including e.g. the 700 MHz **(or part of this band it depends on each EU Member State transition)**, 1.5 GHz, 2.3 GHz, 3.8-4.2 GHz and 5 GHz bands, in Member States and their potential for wireless broadband services on a harmonised basis, prioritising



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the bands in accordance with their potential and timeframe in which they are likely to be available.

Complementary to the identification and possible implementation of wireless broadband in the 700 MHz band **(or part of this band it depends on each EU Member State transition)**, the impact on the environment of media distribution, in particular terrestrial television, RSPG14-578(rev1) needs to be taken into account, when considering the further development of the band 470-694 MHz.

[...]

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[...]

In its [draft] opinion on the UHF band, RSPG recommends that the frequency band 470-694 MHz shall remain **allocated on a primary basis exclusively available for DTT the broadcasting services** in the foreseeable future, i.e. 2030. RSPG is of the view that Member States should also have the flexibility to use the 470-694 MHz band for WBB downlink, provided that such use is **not interfering compatible with the broadcasting needs**.

[...]

[...]

**WRC-15 Agenda Item 1.2** follows the decision taken at WRC-12 to allocate the band 694 – 790 MHz ~~also~~ to the mobile **service on a co-primary basis with the broadcasting service**, except aeronautical service in ITU Region 1 immediately after WRC-15 and to identify the band for IMT. This allocation will facilitate an implementation of mobile broadband systems in Europe in this frequency band. The purpose of the Agenda Item is to determine the technical and regulatory conditions applicable to this mobile allocation, including a possible refinement of the lower band edge.

**The allocation of the 700 MHz (or part of this band it depends on each EU Member State transition) for wireless broadband has to take into account the different technical conditions and regulations of each EU Member State. This allocation requires a transitional period, according to the strategic advise provided by the High Level Group chaired by Pascal Lamy, which envisaged a three step formula “2020-2030-2025” to secure investment for terrestrial television broadcasting below 694 MHz and recommended a detailed transitional program for the allocation of the 700 MHz for wireless broadband.**

[...]



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## Confindustria Radio Televisioni profile

*Confindustria Radio Televisioni* (CRTV) is the association representing the Italian radio and television industry. Established in June 2013 and operating since autumn of the same year, for the first time it gathers all the major broadcasting operators, both public and private, local and national, TV and radio, representing 98% of the market with over 29.000 employees. The Association was founded by Rai, Mediaset, Sky, La7, Telecom Italia Media and FRT, the Federation of local radio and TV operators. The founders were later joined by other TV operators: Digicast, Discovery Italia, Giglio Group, Prima TV, QVC, RTL 102.5, Rete Blu, Viacom International, LT Television, Radio Italia, and, more recently by HSE24 and satellite platform operator Tivù. Associate members include DNG-Digital News Gathering and satellite operators SES Astra and Eutelsat Italia.

The Association participate in the larger Confindustria network (Italian National Association of Entrepreneurs).

Overall CRTV members represent over 90% of the broadcasting market, with revenue of about 9 billion euros and 26.000 direct employees (up to 80.000 taking into account indirect workforce - CRTV 2013 estimates).

CRTV's goal is to represent the broadcasting industry as a whole at institutional, legislative and contractual level. CRTV collaborates on a regular basis with all relevant national ministries, institutions and regulators as well as UE and international organizations and institutions with the objective of securing and promoting the development of the radio and TV industries based on fair competition, equal access and respect of users' rights.

More information and the full Members list are available on CRTV web site [www.confindustriaradiotv.it](http://www.confindustriaradiotv.it).

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