



TDF answer to the public consultation on the Draft RSPG Opinion on Common Policy Objectives for WRC-15

TDF¹ welcomes the opportunity to comment on the Draft RSPG opinion on Common Policy Objectives for WRC-15.

DTT is the leading delivery platform in Europe. Circa 250 Million DTT European users and the whole terrestrial broadcasting sector are likely to be significantly impacted by the policy choices adopted in Europe.

TDF therefore believes that any balanced approach for a successful European wide evolution in the UHF Band must respect two necessary conditions: a long term guarantee for the future of DTT in the 470-694 MHz band and a careful transition plan for the release of the 700 MHz band alongside the guidelines agreed in the Lamy report transition roadmap.

Therefore TDF strongly endorses the RSPG opinion to support no mobile allocation in the band 470-694 MHz under agenda item 1.1.

The benefits for Europe of such a position are clearly emphasized in the conclusions of the Lamy report and in the results of the economic study by AETHA consulting on the Future Use of the 470-694 MHz band².

Under agenda item 1.2, TDF deems essential that broadcasting services remain fully protected below 694 MHz. In particular, this calls for the respect of the 9 MHz guard band above channel 48, which was the basis for compatibility studies. Protection of existing DVB-T networks which will continue to operate must also be ensured, as the transition to DVB-T2 is not yet started in many countries: this calls for further studies as the existing ones assumed DVB-T2 receivers.

¹ TDF group description is available at <http://www.tdf-group.com/masteren/>

Response prepared under the supervision of Arnaud Lucaussy, Director of Regulatory and Public Affairs.

² This study is available at the AETHA consulting website

http://www.aethaconsulting.com/articles/report_econbenefits470694mhz.php

Excerpts:

(Page 4) "The introduction of a coprimary allocation to mobile at WRC15 would have considerable negative impacts on DTT. Given the history of DTT spectrum being awarded coprimary status for mobile and that then leading to the spectrum being cleared for mobile, granting a coprimary allocation to mobile in the 470–694MHz band would undermine investor confidence in the future of the platform. This would lead to the DTT platform falling behind other television platforms and even unnecessarily risk its viability, with little benefit to be derived."

(Page 8): "Our assessment has clearly demonstrated that, on current trends, the economic benefits are maximised for EU citizens if the 470–694MHz band continues to be used for DTT (as well as compatible uses such as PMSE, radio astronomy and white space applications) over the next 15 years. The costs associated with providing linear broadcast television services to all EU households in the absence of the DTT platform are many multiples of the benefits that would arise from making the 470–694MHz band available for mobile services. In summary, the digital terrestrial platform remains key for the cost effective delivery of linear broadcast content to EU consumers and use of the 470–694MHz band is a critical element of the platform."