



The position of VPRT

in regard to the submission to the Radio Spectrum Policy Group (RSPG) opinion on the introduction of multimedia services in particular in the frequency bands allocated to the broadcasting services
RSPG Draft – May 11th 2006

VPRT, the German Association of Private Broadcasters and Telecommunication, represents approximately 160 commercial radio and audiovisual broadcasters, multimedia and television companies operating in Germany and other European countries. VPRT promotes the interests of private broadcasters and multimedia companies in national and international bodies that deal with the elaboration of an economic and technological framework and of conditions for electronic media services.

VPRT welcomes the opportunity offered by the RSPG to express its views on the introduction of multimedia services in the frequency bands allocated to broadcasting services. We would even prefer to play an active role in the development process of RSPG Opinions, for example by presenting the situation for private broadcasters in Germany.

VPRT members provide electronically distributed content services being offered to consumers. Beyond the regulatory, economic, technological and indeed competition considerations, the most crucial roadblock for private and commercial broadcasters concerns access to spectrum for digital broadcasting, in order to guarantee media pluralism due to constitutional premises in German law. We would therefore prefer a 2-step-approach with primary access for broadcasting content. This includes spectrum for establishing new broadcast services and new business models for an attractive portfolio for the users.

VPRT therefore recommends that the results of the RRC-06 will be respected and that the broadcast bands will be still used primarily for the introduction and development of new radio, new mobile TV and data services.

Used broadcast spectrum:

Band III (174-230 MHz), Band IV/V (174-230 MHz) and L-Band (1452-1492 MHz)

Band III:

Band III is already in use in Germany for DAB audio services. Soon, DMB audio and mobile TV services will be launched. Some DVB-T services in Band III are on air as well.

Band IV/V:

Band IV/V is already in use in Germany for DVB-T TV and audio services (especially in Berlin). Soon, DVB-H audio and mobile TV services will be launched.

L-band:

The L-band spectrum in Germany is already available for broadcast services. This band is currently used for T-DAB audio services and T-DMB TV services. Soon, new DMB radio and mobile TV services will be launched.

This demonstrates that in a.m. bands radio and TV services are currently on air. New portable and mobile broadcast services are already planned and will come up in the near future.

VPRT would therefore plead that these frequencies bands will not be allocated to services other than broadcasting.

Digital Dividend:

With the introduction of digital distribution, a higher number of programs can be transmitted. The digital dividend – if any – is just a more efficient way of spectrum usage within one channel. This means, the distribution costs will be less than during analogue distribution. Therefore the possibility for the distribution of audio and TV services using the terrestrial way is increasing. For many private broadcasters, a digital transmission is the first ever possibility to make use of a terrestrial broadcast in an economically reasonable way (terrestrial transmission in Germany is currently < 5 %).

VPRT comes to the conclusion that the digital dividend will not offer the amount of free capacities as previously believed. Secured primary access for audio and TV services, further capacities can be granted to other “multimedia services” (term needs to be clearly defined).