

**Radio Spectrum Policy Group  
Secretariat**

**Consultation in the context of the development of a RSPG Opinion on the spectrum implications of switchover to digital broadcasting**

In accordance to its policy to accompany its work by public consultations, the RSPG has asked the views on this radio spectrum policy issue of all radio spectrum users, both commercial and non-commercial, as well as any other interested parties on the subject matter.

On the detailed issues submitted to consultation, MTV Oy with respect responses the following:

- 1) MTV Oy opposes spectrum trading in principle. Practice and experience has shown, e.g. in the case of 3G-auctions, that spectrum trading is not the way to go.
- 2) In the case of switchover to digital broadcasting it is too early to make decisions on the use of frequencies allocate to television broadcasting. It is obvious, that television broadcasting has to compete with eg. DVD-standards in the quality of TV-picture and that digital television has to have enough frequency allocations to ensure this. For that reason the existing broadcasting allocations should be kept as is till the middle of 2010's.
- 3) In the EU-coordination and in the Radio Regional Conferences an emphasis should be taken to ensure, that each country has enough allocations for television broadcasting.

**On MTV Oy**

MTV Oy is the leading Finnish commercial broadcasting company, running analog and digital MTV3 channel and digital MTV3+ and Subtv channels.