



EUROPEAN BROADCASTING UNION UNION EUROPEENNE DE RADIO TELEVISION

Technical Department

Département Technique

March 2004

EBU responses to the Questions posed by the EU Radio Spectrum Policy Group

(1) How can co-ordination between Member States on spectrum management, at bilateral and EU level, contribute to a quick and efficient switchover?

Coordination on spectrum management in general is arranged via the CEPT. The CEPT membership is wider than the EU, and there is a proven infrastructure to arrange coordination. The CEPT is also able to broker compromises needed for international planning. The ITU organises planning conferences in order to arrive at agreements between administrations, and provides a forum for the preparation of Recommendations and reports.

The role of the EU should be to coordinate general EU policy which can help shape requirements for spectrum management, and help in the successful implementation of digital technology, such as in the need for interoperability of standards. The EU may also help in encouraging Member states to adopt a common timetable for the switchover, so that the total plan for the digital environment can be implemented as early as possible.

Bilateral and multilateral coordination between neighbouring countries will be needed before and after the RRC04/05, and is also needed for any interim start ups of digital terrestrial broadcasting.

(2) In particular, what would be the added value from EU co-ordination ahead of the Regional Radio Conference starting in 2004 and other international negotiations?

As mentioned above, the role of the EU should be in helping to establish general policy to guide the CEPT in its work. For example, the EU should build a consensus for giving adequate priority to digital radio, to ensure the survival of radio in the digital age. The EU may also consider the extent to which allocations may be given to the new types of delivery system such as DVB-H. One of the policy issues in new systems may be the extent to which they may be used for new services in addition to conventional broadcasting. The EU may also consider, for example, whether HD in the DTT bands is strategically important for Europe.

The most effective arrangement would be for the EU to concentrate on building consensus for general policy, and the CEPT to continue to be responsible for the detailed technical matters.

(3) Are greater transparency and technological neutrality of spectrum assignment, notably through valuation and market tools, instrumental to switchover?

The EBU believes that the use of valuation and market tools for broadcast services used for free to air public service broadcasting will be counterproductive to switchover. The worth of public service broadcasting to society cannot be calculated in monetary terms, and in any event, free to air broadcasters will already be paying significant costs for the change of infrastructure from analogue to digital.

Valuation and market tools could be appropriate for point to point and profit making services, but they are not appropriate in the broadcasting environment of EBU Members.

(4) What will be the "spectrum dividend" from switch-off, and how should this be allocated to specific services?

Digital broadcasting is, like for like, more efficient than analogue broadcasting. However, it is too early in the planning process to know what residual frequencies may or may not be available after the switchover, and hence this question cannot be answered completely at the moment.

However, in the digital environment, it is clear there will be new public expectations from broadcasting. The public will demand an enlarged choice of services or they will see no reason to buy digital receivers. Digital broadcasting will enter a world where the public will expect a wide choice of services on a range of receivers from large flat panel displays with HD capability to handheld sets. Unlike analogue broadcasting, digital broadcasting is readily capable of serving the public in multiple ways – but it can only do so if adequate spectrum is available.

Even if the only goal of digital broadcasting had been to duplicate what is already available from analogue broadcasting, the availability of any spectrum dividend would, even so, depend on national circumstances. Factors such as the country's geographical position in Europe, and whether or not the services need to be universally available, influence what is practically possible. A spectrum dividend in one country does not mean it is also available in others. Any spectrum dividend would only be available when analogue broadcasting is finally switched off.

Importantly, current EBU studies show that in the European environment, with its high population density, achieving universal national coverage with even the six multiplexes sought by most nations will require virtually the complete broadcast bands to be used solely for broadcasting. It will be difficult enough to achieve services which meet public expectations using all the broadcast bands, without part of the bands can be made available for point to point services of one kind or another. Providing 'universal' coverage is part of the public service mission, and doing so will require adequate spectrum.

Broadcasters also need allocations for SAB (Services Ancillary to Broadcasting) and SAP (Services Ancillary to Programme making), and special measures need to be taken to ensure spectrum for this vital element of programme production. DAB services need to be included as a priority in Band III in most parts of Europe.

(5) Does convergence require more flexible allocation mechanisms than traditional ones, which tightly link frequency bands and individual communication services according to ex ante decisions?

Traditional allocation mechanisms are needed for efficient and low cost (for the consumer) broadcasting services. Flexible allocations may be efficient for point to point services, but they are counterproductive for free to air broadcasting services, where receivers need to reliably and rapidly find broadcast stations.

However, a spectrum plan must allow for technological evolution over time, and thus should be based on criteria such as protection ratio limits, rather than on the use of specific technologies. Spectrum planning should be based on the premise that other appropriate technology can make use of broadcasting entries in the plan, provided they meet given interference criteria. They will be protected against interference to a given extent. This has been the basis of planning for satellite band broadcasting services, and has allowed for the evolution to digital technology, and will allow for further stages of evolution.