

**RADIO SPECTRUM POLICY GROUP DRAFT OPINION
ON THE DIGITAL DIVIDEND
Comments by Mediaset S.p.A.**

Notwithstanding the crucial role of bilateral and multilateral coordination within the ITU's WARC system, Mediaset appreciates the RSPG efforts to maximize the benefits of digital transition and welcomes the opportunity to comment, individually and through the association the Association of Commercial Television (ACT), the RSPG draft opinion on digital dividend¹.

National priorities on radio spectrum are drawn on the basis of historical, social, political and geographical criteria. In Mediaset's opinion, different experiences are to be assessed further to a case by case analysis, without assuming that one specific model has to be the paradigm for all the others.

Concerning digital switch over, it is worth reminding that, in its COM (2003) 541, the European Commission identified the transition from analogue to digital terrestrial television as a crucial and cost-effective investment in order to bring universal, pervasive digital television services in every home throughout the EU, and therefore recognized that, should any spectrum be released after analogue switch-off, *it could be redistributed or reinvested in broadcasting to improve and extend the service*².

Relying on this political message, and on the perspective to widen the traditional television offer in order to provide new and enhanced services - e.g.: interactivity and mobile tv), new formats (such as 3d Tv), as well as better quality (such as HDTV or other higher definition standards - both PSBs and commercial broadcasters, regardless of the severe competitive challenges of a multiplatform environment, continue to invest on new editorial products, network infrastructures and equipment upgrade.

In the case of Italy, due to the significant amount of local tv-stations (over 600), which deliver diversity and pluralism in line with both Italian and

¹ Mediaset already participates to Commission Hearings on the Digital Dividend held in Brussels the 6th of March 2009.

² COM(2003) 541, final published on 17.09.2003

community law, spectrum continues to be fully and efficiently utilized. In addition, digitization brings about high costs for spectrum refarming. The Italian National Regulatory Authority (Agcom) maintains that, in order to grant greater efficiency in the use of the available frequency band, it will be compulsory to operate through SFNs (Single Frequency Networks).

Consequently, in order to provide 21 national DVB-T frequencies, covering approximately 80% of the Italian territory, 4 national frequencies for DVB-H and 11 national frequencies (divided in regional areas for local channels) it will be necessary to use 36 national frequencies. A supplementary portion of spectrum will be used to ensure smooth and efficient coordination with neighboring countries.

In conclusion, at this stage, as far as Italy is concerned, making the 790-862 Mhz frequencies available for electronic communication networks or electronic communication services would impair the broadcasters' possibility to ensure a return on the investments carried out thus far in order to make digital terrestrial television available in every home and to speed the transition to fully digital television services.

European policy makers should bear in mind that European commercial broadcasters, along with PSBs, finance more than 80% of original European programming (excluding news), thereby sustaining a value-chain that provides over 2 million jobs throughout the EU. Moreover, DTT grants universal, equal access to every citizen and, unlike cable and IPTV, it requires neither connection nor subscription fees (satellite can be free too but, due to its transnational footprint, requires higher investments for encryption and decryption of copyrighted materials).

If the EU is keen on pursuing its goal of promoting a digital economy that will enable an equitable and pro-competitive knowledge society, the enhancement of traditional television services is a fundamental and pivotal step that will trigger positive effects for the consumers and the entire value chain of network and creative industries.