

## **Reply of VAUNET on the (Draft) Radio Spectrum Policy Group (RSPG) Opinion on Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU**

**Date** August 24th, 2023

VAUNET welcomes the opportunity to comment on the (Draft) RSPG Opinion on Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU. This RSPG initiative is an important contribution to the establishment of a long-term and coordinated EU spectrum management strategy.

### **Importance of terrestrial broadcasting and wireless production technology**

#### **a) Why broadcasting needs the frequencies.**

Broadcasting needs the frequencies between 470 and 694 MHz in the long term. This also applies to the period after 2030, which is being discussed at the World Radiocommunication Conference. The importance of broadcasting itself is undisputed. Whether public or private, broadcasting ensures a broad supply of information. It also provides education, culture, and entertainment. All this is of particular importance today. Quality media are the answer to disinformation and hate speech. Quality media are part of the process of will formation. Therefore, broadcasting is relevant to the system.

Broadcasting content must be disseminated. There are different ways to do this. One important way is terrestrial broadcasting (DVB-T2). There are numerous reasons to secure television broadcasting via DVB-T2. In the event of a disaster, DVB-T2 is indispensable. Thanks to secure transmitter sites, cleverly planned emergency power supplies and redundant signal feeds, DVB-T2 continues to transmit even during events such as storms and flood disasters. This is not guaranteed with mobile communications. Moreover, DVB-T2 is independent of the internet and can be operated autonomously. In contrast to the internet, network congestion is ruled out with terrestrial broadcasting (DVB-T2), even during intensive use. This means that broadcasting, as part of the critical infrastructure, can save lives in the event of a disaster. Broadcasting informs the entire population reliably, quickly, and comprehensively. In this way, measures, including those to save lives, can be communicated.

Broadcasting is working to further improve its dissemination in the event of a disaster, but also in normal circumstances. The aim is to reach the population directly on mobile devices. This is to be done in such a way that no data volume is consumed, optionally even without a contract with a mobile phone company. The broadcasting standard 5G Broadcast is fundamental for this. Broadcast network operators and ARD are working on specifying the requirements of the new broadcasting channel in the responsible standardization bodies (ETSI, 3GPP) and testing them in pilot trials. This would make it possible to use broadcasting on mobile phones in a cost-effective, energy-efficient, and possible for everyone.

## **b) Why the cultural and creative industries need the frequencies**

Wireless microphones are used at almost all events: professional productions such as the World Cup or the European Football Championship, festivals such as Rock am Ring, on theatre stages, in churches, at conferences or lectures and political events. In 2021, the cultural and creative industries had the second highest gross value added in a German industry comparison, despite the pandemic that had made live events impossible in the meantime. Broadcasting also uses wireless microphones for its productions.

### **Political demands**

Further planning of a terrestrial broadcasting and media distribution infrastructure requires certainty regarding the frequency resources available in the 470-694 MHz range in the long term. Therefore, VAUNET demands:

- **in principle:** development perspective and planning security for terrestrial broadcasting/media distribution beyond 2030
- **concretely:** unchanged allocation of the UHF TV frequencies (sub-700 MHz band) at the World Radiocommunication Conference 2023 (WRC-23) primarily to broadcasting alone and secondarily to wireless means of production, i.e., no co-primary or secondary allocation of the UHF TV spectrum to other radio services (e.g., authorities and organizations with security, armed forces, or mobile radio)
- the extension of the current EU regulatory framework, i.e., the possibility of using the UHF TV frequencies for broadcasting as well as for wireless means of production beyond 2030

### **About VAUNET**

VAUNET is the association of private audiovisual media in Germany. The diverse business areas of the approximately 160 members include TV, radio, web, and streaming offerings.