

Radio Spectrum Policy Group

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Comments from Digital Broadcasting s.r.o., a Czech company, on the Draft RSPG Opinion on Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU

Digital Broadcasting s.r.o. (DB)¹ would like to express gratitude for the opportunity to provide comments on the Draft RSPG Opinion on Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU (RSPG). The 470-694 MHz section of the UHF band is in Czech Republic currently allocated for Digital Terrestrial Television (DTT), we believe it is effectively allocated and plays a key role for TV broadcast industry.

We would like to highlight some important information:

- **Preference and Usage:** Approximately **54.5% of households**² in the Czech Republic rely on DTT as their preferred platform for television reception. This underscores the fact that DTT is the most preferred method of accessing television content among Czech households.
- **Continued Strength:** Even following the compulsory release of the 700MHz band, which necessitated a transition from DVB-T to the more frequency-efficient DVB-T2 standard, DTT remains the most robust and preferred platform for television broadcasting in our country.
- **High Compatibility:** An impressive 95% of households in the Czech Republic are equipped with DVB-T2 compatible receivers, indicating the widespread adoption of this technology and the readiness of viewers to access DTT broadcasts.
- **Crucial Information Platform:** DTT serves as a vital **free-to-air information platform** that broadcasts a diverse range of content, including both state-owned and commercial TV stations. This positions DTT as a unique platform that provides essential information to viewers across the nation, including **during times of crisis**.

As of information mentioned above, we propose to modify chapter 4.1:

*“Representative cases are, for example, those of Spain, France, Poland ~~and~~, Croatia **and the Czech Republic** where, despite the extensive fibre optic fixed broadband network, DTT continues to be one of the most used platforms.”* The chapter could also include a full table of all EU countries where DTT is significant.

The RSPG document lacks a detailed evaluation of the various scenarios and their consequences listed in Part 4. Before making any decisions with irreversible consequences regarding the UHF band

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² Source: Nielsen Atmosphere research, the results of the Continuous Research of the 1Q 2023

470-694 MHz, particularly in the case of scenario 3, we suggest a thorough consideration of the impacts on social, economic, political, environmental factors, broadcasting market competitiveness and population needs

We firmly believe that prior to any reallocation of the 600MHz band for mobile broadband, it is necessary to comprehensively analyze the current utilization of the entire UHF band. Such an analysis could potentially unveil diverse approaches for funding development and enhancing the efficiency of mobile broadband frequency allocation, while safeguarding the integrity of the DTT services. Furthermore, it is possible to argue that certain operators, providing both mobile and IPTV services, might have a great interest in restraining competition within TV distribution by reducing or limiting frequency spectrum allocation for DTT.

Since there is no long-term indication that the trend of using DTT will change, any intervention in the functioning broadcasting market through a change of frequency allocation in the UHF spectrum will have a negative impact on society and the principles of effective spectrum management. **Therefore, we firmly believe it is necessary to preserve the 470-694 MHz UHF band for DTT use, even beyond 2030 and at least until 2040.**

The flexibility defined in Article 4 of the UHF decision is a crucial regulation that guarantees the **safeguarding of DTT within the 470-694 MHz range of the UHF band, in accordance with the ITU Geneva Conference of 2006.**

Listed below are other significant key points:

- DTT is the only free-to-air reception for Czech household, for both public and private services
- It is most penetrated method of linear television distribution in the Czech Republic
- DTT transmitters are a part of state's critical infrastructure
- DTT operates without registration or contracts, ensuring anonymity and non-discrimination
- DTT displays substantial resilience against cyber threats, impossible to overload compared to IP
- With nationwide coverage and limitless receivers, without limiting broadband connectivity
- Decreased frequency allocation may lead to fewer programs, waning interest, and reduced crisis-ready households.
- DTT exhibits a significantly lower carbon footprint in contrast to non-DTT technologies
- The DVB-T2 standard is highly frequency-efficient
- This innovative platform can seamlessly blend linear and interactive services like HbbTV

Best regards,

Digital Broadcasting s.r.o.