

# Position Paper

2023 August

## Comment on the Draft RSPG Opinion: Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU

### Context

Currently, the 470-694 MHz band is mainly used for Digital Terrestrial Television (DTT) broadcasting services in Europe. The European Commission has prioritized the 470-694 MHz range until 2030 for broadcasting applications, and in particular television broadcasting and PMSE (EC decision 2017/899) but also decided to review the usage of the band by 2025 to decide on the most efficient use of the band beyond 2030. The customer acceptance of DTT across the member states is very diverse and there is a demand to allow for other services to be operated in that band. It is necessary to establish a European approach that can effectively accommodate diverse interests in a harmonious manner. Furthermore, the ITU World Radiocommunication Conference 2023 will decide on mid to long term spectrum use options for the band 470-694 MHz under agenda item 1.5. Bitkom therefore welcomes the possibility to provide comment on the RSPG opinion on “Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU”.

### Future scenarios

Besides the existing users, other stakeholders such as public mobile communications, PPDR or military have announced their demand for spectrum in the 470-694 MHz range for future applications.

The mobile communications bands allocated in the 694-960 MHz frequency range are intensively used for the provision of public mobile services. The mobile-operators continuously invest in expanding their coverage and enhancing network performance. The sub-1GHz spectrum is the basis for mobile broadband in rural regions and for deep

indoor coverage. While at least parts of the 900 MHz band will still have to be used by GSM for the foreseeable future due to market demand (e.g. inbound roaming, 2G-based M2M) and regulatory obligations like e-call, the 700 and 800 MHz bands are deployed for mobile broadband services. The demand for mobile broadband services is constantly increasing and can not only be satisfied by technical measures or network densification. Sufficient low-band spectrum (<1 GHz) is necessary for satisfying the customer demand in rural areas but also indoor. There is a high public interest in performant mobile communications services in rural areas and along transport routes, especially with regard to foreseen new functionalities supporting automated driving. Low-band spectrum is key for digital equality and the only sustainable way to enable customers in sparsely populated areas to use high quality mobile broadband services.

At the same time, there is a declining demand for terrestrial linear television, especially among younger age groups, and a massive increase in non-linear video consumption. In several EU member states, daily non-linear video minutes exceed the linear video minutes already today (c.f. CEPT Draft Brief on WRC-23 Agenda Item 1.5). As the terrestrial broadcast platform is limited to linear distribution, ever increasing broadband connectivity is complementing and gradually replacing dedicated video delivery. In the next decade, in a Gigabit Society as per EU targets, broadband connectivity to homes could make UHF spectrum use for (linear) video distribution obsolete for fixed use cases in many countries. In summary, the change in the way customers consume media content must be considered when deciding on the efficient usage of the band 470-694 MHz beyond 2030.

## Recommendations

Bitkom appreciates that the RSPG recognized the need for considering different scenarios and the different needs of countries. Bitkom recognizes that the scenarios presented in this opinion seem not to be assessed on the same level. Considering the trends described above, Bitkom considers Scenario 1 unlikely for the entire EU. Bitkom has the opinion that besides the mentioned scenarios there should be an additional scenario which fully describes the situation where a group of Member States do not have a DTT demand anymore, i.e. where the entire 470-694 MHz band could be considered for mobile services.

The main objective for the ongoing review of the future usage of the UHF band should be to ensure an efficient way of spectrum usage but also to take into account the different needs of the Member States. Europe needs to develop a widely harmonized approach which also provides flexibility to serve national circumstances and needs.

Bitkom expects the RSPG to further develop respective usage scenarios for 470-694 MHz beyond 2030. Beside technical issues, this should also include a socio-economic benefit analysis.

In addition, Bitkom would like to emphasize the need for an overall spectrum management strategy which secures the Digital Decade & Connectivity Goals that the European Union has defined for itself. Especially, regarding the 6G era, the EU is

responsible to provide the spectrum resources necessary to reach these digitalization goals to the benefit of everyone.

Bitkom represents more than 2,200 companies from the digital economy. They generate an annual turnover of 200 billion euros in Germany and employ more than 2 million people. Among the members are 1,000 small and medium-sized businesses, over 500 start-ups and almost all global players. These companies provide services in software, IT, telecommunications or the internet, produce hardware and consumer electronics, work in digital media, create content, operate platforms or are in other ways affiliated with the digital economy. 82 percent of the members' headquarters are in Germany, 8 percent in the rest of the EU and 7 percent in the US. 3 percent are from other regions of the world. Bitkom promotes and drives the digital transformation of the German economy and advocates for citizens to participate in and benefit from digitalisation. At the heart of Bitkom's concerns are ensuring a strong European digital policy and a fully integrated digital single market, as well as making Germany a key driver of digital change in Europe and the world.

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