

Response to the draft RSPG opinion on the strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU

1. Motivation and background

ZVEI welcomes the opportunity to provide feedback on the RSPG's draft opinion on "the strategy on the future use of the frequency band 470—694 MHz beyond 2030 in the European Union (EU)".

Furthermore, we would like to emphasize that we fully recognize the importance of the RSPG's Opinions in advising the European Commission and in helping to map out the longer-term spectrum management strategy of the EU.

ZVEI - German Electro and Digital Industry Association represents both the manufacturers of components needed for 5G infrastructure as well as potential user industries, such as companies specializing in industrial automation, energy, healthcare, smart home solutions, TV manufacturer and PMSE (program making and special events).

2. Comments on the RSPG draft opinion

2.1 Importance of the 470-694 MHz Band for digital terrestrial television (DTT) and PMSE

The sub-700 MHz band (470-694 MHz) is used in all EU and almost all European countries to provide free-to-air digital terrestrial television (DTT) services to their citizens. The band is shared with Program Making and Special Events (PMSE) which is widely used by the creative industries. Typical PMSE applications include radio microphones and talkback systems.

PMSE applications are essential not only for broadcasters and other content producers but also for cultural, sporting, artistic, political, religious, educational, and civil society organizations. Some of these are significant economic sectors, and all are key components of people's social lives. Wireless PMSE equipment allows great operational flexibility with low production costs. This has resulted in a steadily increasing number of productions and their complexity and, as a consequence, an increasing spectrum demand, especially at large events.

The combined use of the UHF band by DTT and PMSE offers huge public value, and no viable alternative for creating and delivering content as efficiently have been identified.

In various Member States e.g. Spain, France and Poland the usage of free to air DTT is still very significant and there is no visibility on short term reduction of DTT spectrum needs – DTT here continues to be the most popular platform.

It is therefore critically important to ensure that DTT and audio PMSE continue operating in the UHF band without additional constraints or further reduction of the available spectrum. For PMSE audio services, there is no alternative frequency band with equivalent favorable physical characteristics and capacity.

Technical studies and the experience with the repurposing of the 700 MHz and 800 MHz bands clearly show that sharing between DTT and PMSE and IMT systems such as 4G and 5G is not possible. Any further repurposing of spectrum below 694 MHz for IMT systems would eliminate the current economic and social benefits (including for the environment)¹ of DTT and PMSE.

Therefore, we strongly urge to keep the whole of the remaining UHF spectrum for culture and broadcasting beyond 2030.

2.2 Comments regarding the RSPG recommendations

ZVEI welcomes the balanced wording of the draft RSPG opinion on the future use of the frequency band beyond 2030 considering the relevance of DTT and PMSE. Nevertheless, we would like to add the following comments regarding certain recommendations:

Recommendation 3

The RSPG draft opinion recognizes that a single scenario for the use of 470 to 694 MHz may not be possible across all Member States.

What is consistent in all mentioned scenarios is the requirement for audio PMSE to maintain access to the band.

For those countries that preserve DTT across the whole band, PMSE sharing can continue under established regulatory provisions. For those countries looking to reallocate some or all of the band to other applications, there is a fundamental requirement to develop and implement new sharing regimes that allow for other applications while preserving access to the 470 to 694 MHz band for audio PMSE.

These new sharing arrangements, and potential new spectrum allocations for PMSE, should be harmonized as far as practicable.

Recommendation 5

The RSPG notes that some Member States have indicated a need, at a national level, for spectrum for Public Protection and Disaster Relief (PPDR) and Defence. The RSPG recommends that sub-700 MHz spectrum should be made available nationally for these use cases where there is a decreasing need for broadcasting. This recommendation further underlines the future challenges that audio PMSE may face, i.e. moving from a well-understood and reliable sharing environment with DTT in all Member States, to a future where there could be a range of different sharing scenarios depending on national implementations of new mobile services.

It is therefore crucial that the impact of these future scenarios is assessed, and new sharing models established to support the growth in PMSE and ongoing access to the 470 to 694 MHz band.

Recommendation 9

The RSPG draft opinion notes that any future EU action in the 470 to 694 MHz band is independent of the outcome of WRC-23. This highlights that within the EU, regulatory uncertainty for access to the 470 to 694 MHz band for audio PMSE will exist beyond 2023 regardless of the outcome of the WRC-23.

Given the timescales for studies, analysis and development of alternative spectrum sharing frameworks, work within CEPT should begin as soon practicable after WRC-23 to explore post-2030 spectrum options.

2.3 Conclusion

The RSPG draft opinion highlights the difficulty in developing a common position on the future use of the 470 to 694 MHz band. Some Member States will continue with DTT; there is potential for development in terrestrial broadcasting with the introduction of 5G Broadcast; some Member States are looking to utilize the sub-700 MHz band for other applications such as PPDR or wireless broadband, including International Mobile Telecommunications (IMT).

Within these different scenarios there is a consistent requirement – the ongoing growth of audio PMSE and the requirement to maintain access to the 470 to 694 MHz band.

¹ DTT in the lower UHF spectrum is a green distribution delivery method. A [recent study](#) shows that DTT distribution consumes substantially less energy, when compared to IP-delivered methods, for the delivery of the same content to as many viewers.

The RSPG draft opinion itself notes that new access arrangements will need to be found to ensure sufficient spectrum for audio PMSE.

Furthermore the RSPG draft Opinion suggests that new access arrangements should be analyzed at a national level. We disagree with this view.

While Member States may develop different spectrum policies within the sub-700 MHz band for other applications, the use of spectrum for audio PMSE is broadly similar from country to country, particularly for large, 'peak demand' events and for touring productions.

Consequently, to avoid single-country solutions and fragmentation of the product market across the EU, we urge the RSPG to find a harmonized approach to spectrum for audio PMSE.

ZVEI: Electro and Digital Industry Association

The ZVEI represents the common interests of the electrical and digital industry and the associated service companies in Germany and at international level. The association has more than 1,100 member companies, and 170 employees work in the ZVEI Group.

The industry employs nearly 906,000 workers in Germany (as of April 2023). In 2022, its turnover was around 225 billion euros.

The electrical and digital industry is one of the most innovative economic sectors in Germany. One fifth of the industry's turnover is accounted for by product innovations. Every third innovation in the manufacturing industry as a whole gets its original impetus here. Almost a quarter of all R&D expenditure in the manufacturing sector in Germany comes from the electrical and digital industry. Every year, the sector spends around 20 billion euros on R&D and more than seven billion euros on investments.

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