

14 January 2011

The EBU response to the Public consultation on the draft RSPG Opinion on Common Policy Objectives for WRC-12

The European Broadcasting Union¹ (EBU) welcomes the opportunity to present its comments on the draft RSPG Opinion on Common Policy Objectives for WRC-12.

We agree with the RSPG view that there are several EU policies which are relevant for WRC-12 (e.g. information society, internal market, environment, transport, space policy, audiovisual policy, research and development) and that international spectrum regulations should support all EU policies.

Our comments are submitted with the understanding that the present RSPG Opinion should identify the relationship between WRC-12 agenda items and EU policies, and that possible common policy objectives to be pursued at the WRC-12 should not favour one EU policy at the detriment of the other.

WRC-12 Agenda item 1.5

The EBU shares the view expressed in the present draft Opinion in support of harmonisation of tuning ranges for ENG/OB applications through ITU-R Recommendations. Such harmonisation would offer greater flexibility, facilitate global circulation of equipment and increase economies of scale.

WRC-12 Agenda Item 1.17

Cross-border coordination between mobile service and broadcasting service in neighbouring countries is governed by the GE-06 Agreement which was established before the frequency band 790-862 MHz has been opened for the introduction of electronic communication services other than broadcasting and identified for use by IMT applications. These latter include the case where the same frequency is used in a cellular network throughout a large geographical area such as large regions or a whole country. This case has not been considered as such in the GE-06 Agreement. Therefore, the impact of multiple interfering stations of the mobile service was addressed in the studies made by the ITU/JTG5-6 as mandated by the WRC07.

¹ The EBU is the world's largest professional association of national broadcasters, whose Active Members are public service broadcasters in 56 countries corresponding to the ITU European Broadcasting Area, which includes all European countries, Central Asia, North Africa and the Middle East. Associate Members include broadcasters from Canada, the USA, Japan, Mexico, Brazil, India and Hong Kong, as well as many others.

The EBU's purpose is to serve and support the interests of its Members, promote cooperation between broadcasters and facilitate the exchange of audiovisual content. The EBU works to ensure that the crucial role of public service broadcasting, which is central to Members' activities, is recognised and taken into consideration by decision-makers.

The organization provides services to the broadcasting community at large, along with expertise specifically to Members on legal, technical and programming issues. It also conducts economic and market analyses and offers targeted training programmes. For more information about the EBU: www.ebu.ch

These studies showed that the potential impact of the cumulative effect of interference from base stations, which individually did not trigger the need for coordination with broadcasting, could be significant. On the other hand, taking into account the elements previously mentioned, the potential impact of cumulative interference might be less significant in practice. Therefore, JTG5-6 drew the attention of administrations on this issue and offered the choice between 3 options. Discussion in CEPT is still ongoing to make a final choice for Europe between these options.

The WRC-12 provides an opportunity to introduce suitable measures which would facilitate introduction of mobile services in the band 790-862 MHz in the EU Member States and at the same time ensure that broadcasting services in the neighbouring countries are protected. It is important that national administrations have the possibility to identify and resolve such cases as appropriate during their bi or multi-lateral cross-border coordination.

WRC-12 Agenda item 8.2

Broadband as an enabling platform is vital for broadcasters because it enables a strategic evolution towards personalized, on-demand and interactive media services. These services are increasingly important for media providers (e.g. broadcasters) and users alike and the market demand is evident.

Broadcasting plays an important role in fulfilling the EU and national audio-visual policies. In particular terrestrial broadcasting is crucial in fulfilling the universal service requirements. Digital Terrestrial Television (DTT) is very successful in many countries and is driving the digital switch-over in Europe where the number of viewers is steadily growing. DTT is widely supported by manufacturers, network operators, broadcasters, regulators and the public. Furthermore, it provides a competitive alternative to other delivery platforms. Sufficient amount of available spectrum is an essential requirement for further development of DTT.

It is the EBU view that only a combination of broadcast and broadband technologies can facilitate a full range of media services to be made available to the consumers. This would safeguard the audiovisual policy objectives and would greatly contribute towards achieving the objectives of the Digital Agenda for Europe.

Therefore, spectrum needs of both wireless broadband as well as terrestrial broadcasting should be taken into account when considering agenda item(s) for WRC-16.

Other WRC-12 Agenda items

With regard to other WRC-12 Agenda that are relevant for broadcasters (e.g. 1.2, 1.4, 1.10, 1.13, 1.14, 1.15, 1.17, 1.19, 1.22, and 1.23) the EBU supports the views expressed in the present draft Opinion.