

VPRT's COMMENTS ON THE DRAFT RSPG OPINION ON COMMON POLICY OBJECTIVES FOR WRC-12

The Association of Commercial Broadcasters and Audiovisual Services in Germany (VPRT) represents the interests of approximately 150 companies operating in the fields of commercial television, radio and multimedia. About 90 members out of the 150 are active in the television sector. The future development in the UHF-Band is of utmost importance to our television service members.

VPRT welcomes the opportunity to comment on the draft RSPG Opinion on Common Policy Objectives for WRC-12. In our contribution we would like to concentrate on some specific points which are important for commercial broadcasters in Germany.

WRC-12 agenda item 8.2 and RSPG's current recommendation to support agenda item(s) for WRC-16 addressing the allocation and/or further harmonisation to meet the wireless broadband need.

Commercial broadcasters support the development of the broadband infrastructure in Europe, not least as broadband is an important way to deliver media content and services to the consumer and enables a personalized use. However, Digital Terrestrial Television (DTT) has its own potential for innovative developments, and the dimension of its technical reach cannot be substituted by one of the other means of delivering broadcasting services. Also in terms of spectrum efficiency, which is in our understanding one of the main aims of the European Commission's proposal for a Radio Spectrum Policy Programme, the one-to-many distribution via DTT is much more efficient than the one-to-one distribution of on-demand services. We therefore would like to stress the importance to find a fair balance between the spectrum needs of wireless broadband and DTT. At the same time it should be assured that the experience of using the 800-Mhz-Band, in particular for the purpose of bridging the digital divide and promoting high quality wireless broadband, needs to be assessed and taken into account before thinking about allocating further spectrum.

WRC-12 agenda item 1.19 with regard to cognitive radio

With regard to cognitive radio VPRT comments separately on the draft of the RSPG Opinion on Cognitive Technologies. But we would like to also take this occasion to point out that, for the time being, the use of cognitive radio systems in the 'white

spaces' of the frequency band 470-790 MHz cannot ensure the protection of the existing broadcasting services. Therefore it should be also taken into account that existing users need safeguards that their services are not impaired by new technologies.

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