

**RTÉ response to the public consultation on the Draft RSPG
opinion on Strategic Challenges facing Europe in addressing
the Growing Spectrum Demand for Wireless Broadband**

2nd May 2013

RTÉ, Ireland's primary Public Service Broadcaster, welcomes the opportunity to comment on the work of the RSPG. Our comments are related to the UHF band.

Free to air Digital Terrestrial Television in Ireland covers over 98% of the population. Since the launch of SAORVIEW in May 2011 the platform has continued to grow market penetration as more and more homes replace their television sets and with development of services on the platform. We expect Digital Terrestrial Television to continue to grow in Ireland and remain a key delivery platform beyond 2020.

Comments

RTÉ is encouraged to see the draft RSPG opinion recognises the substantial portion of spectrum already allocated to wireless data, and we believe that the focus of the opinion should shift to ensuring wireless data is delivered more efficiently within existing allocations before seeking to expand them further. RTÉ recommends that further work is carried out to explore the costs associated with getting optimum efficiency from existing wireless data bands (e.g. faster migration to more efficient technologies and moving to smaller cell sizes) and looks forward to RSPG initiatives in this area. The inevitable use of smaller cell sizes for wireless data, which are best suited to higher frequencies bands, could result in a reduced demand for UHF spectrum currently used for broadcasting. As such we propose that the 700MHz band may not be suitable for wireless data in the long term and should be relisted as having "limited" potential in Annex 1 and 2).

The benefits of applying more spectrum to a perceived shortage are likely to be limited, and will only give temporary relief to the problem if it is not addressed through more efficient usage. On the other hand reallocating spectrum from terrestrial broadcasting will seriously limit its potential growth and sustainability and might not be an efficient means of recognising recent but substantial investment in digital terrestrial broadcasting that has been made in very recent years. RTÉ encourages the RSPG to pursue a strategy focused on ways to increase efficiency and capacity within existing wireless data allocations first.

RTÉ welcomes the RSPG's review of wireless data traffic (Trends in wireless technology, Trends in consumer behaviour and demand) and would encourage more work in this area. There is much uncertainty relating to potential increases in wireless data traffic which need to be validated. In particular we note the RSPG's findings on the relative growth in Wi-Fi off-load (growing 4-6 times faster than mobile traffic) and note that this has occurred without any recent additional spectrum allocations. Considering the growing significance of Wi-Fi in delivering wireless data needs, it seems that traditional telecoms notions of guaranteed quality of service are not as significant as they used to be, and is not a justification for increased wireless data spectrum allocations.

Regarding the draft opinion on the 700MHz band, the loss of capacity to broadcasting cannot be compensated for alone by applying DVB-T2 and HEVC. Broadcasting will need the opportunity to develop new and higher definition services to be sustainable – this would be expected within the already reduced spectrum allocation without the need to request additional spectrum. Recognising that in some member states such as Ireland migration to DVB-T2 may not be necessary during the period under consideration.

It is important to reconfirm the exclusive primary status of the broadcasting in the remaining UHF spectrum (470 to 790MHz) to prevent the spread of uncertainty that is damaging to the broadcast industry. This uncertainty needs to be removed and Annexes 1 and 2 should be amended to reflect this. A policy review at this stage is likely to introduce further uncertainty. It is RTÉ's opinion that the RSPG should re-state that this band is critical to for terrestrial broadcasting and that it is expected to remain important beyond the period covered by the draft opinion.