

Public consultation on RSPG: “Work Programme 2024 and beyond ” Contribution by Elettronica Industriale S.p.A. – Media for Europe group

Elettronica Industriale (EI) welcomes the opportunity to submit a consultation response and share its views on the (Draft) RSPG Work Programme for 2024 and beyond.

Europe embodies a collection of values such as democracy, universality, sustainability, diversity, inclusion and accountability, which guide how political and business decisions and choices are made and implemented. Also, the idea of equality of each and all European citizens, independently of their age, educational level, socio-economic conditions or place of residence should drive regulatory decisions.

EI is an active member of BNE (Broadcast Networks Europe) and BNE members have developed a vision for Europe beyond 2030, which articulates how its members aim to make a difference: providing universality and accessibility, enabling relevant public service media, highlighting Europe's role model for democracy, fostering European diversity and richness, contributing to a fair and dynamic European single market, boosting competitiveness and fair competition thanks to a long-term regulatory framework, igniting innovation for all Europe and, overall, supporting a stronger Europe.

The Digital Terrestrial Television Value Model illustrates the multiplicity and diversity of contributions delivered by digital terrestrial broadcasting, in terms of sovereignty and resilience, innovation, democracy, creativity and culture, social commitment and environmental sustainability².

Without a long-term certainty, even beyond 2030, all this European value would be putted at risk.

EI's main interest is related to the Assessment of future usage of the frequency band 470-694 MHz within the EU.

We believe that any assessment for new frequency band allocation should be based on efficient use of radio spectrum as the key principle pursuant to the applicable Union Law. This is of crucial

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importance for any decision that might impact the current allocation of frequency band 470-694 MHz since it represents the only band left in Europe for terrestrial television broadcasting. Moreover DVB-T/T2 guarantees minimum consumption of energetic resources since it is the technology with the lowest CO2 emissions¹.

On this basis the following comments on the draft “Work Programme for 2024 and beyond” are provided. The response is organised according to the structure of the document with comments directly referring to the text with highlighted boxed sentences.

Peer review and Member States cooperation

Considering

- Work area “*Assessment of future usage of the frequency band 470-694 MHz within the EU*” and
- RSPG “Opinion on the strategy on the future use of the frequency band 470-694 MHz beyond 2030” where it concludes that a single scenario may not be applicable to all Member States,

EI proposes to introduce an additional bullet item at the end of section “Planned type of deliverable”, as follows:

Planned type of deliverable

- Peer Review Forums according to Article 35 EECC with regard to harmonised spectrum.
- At the request of the concerned national authority: as appropriate, reports and opinions on voluntary Peer Review Forums, Article 35 (7), (9).
- Annual reports according to Article 35 (8) EECC (published each February).
- Informal Award Workshops on upcoming and past awards.
- Stakeholder Workshops on awards and/or other relevant topics, as appropriate.

¹ The Low Carbon TV Delivery Project – LOCAT Project - Quantitative study of the GHG emissions of delivering TV content.

- **Considerations on bands where a harmonized approach may not be applicable.**

WRC

It is of utmost importance to take into consideration the results of RSPG “Opinion on the strategy on the future use of the frequency band 470-694 MHz beyond 2030” where it concludes that a single scenario may not be applicable to all Member States and recommends n. 3 and 4.

“3. RSPG recognises the possibility that, for the use of the 470-694 MHz band, a single scenario may not be applicable to all Member States. Therefore, RSPG recommends any future EU regulatory action to facilitate, to the extent feasible, the implementation of various scenarios among Member States, emphasizing the pursuit of compatible uses and focusing on the means to achieve them. Any regulatory action should also take into account the possible uses, already enabled by the implementation of Article 4.

4. RSPG recognises that, in the border areas of EU, successful coordination negotiations could rely on spectrum regulation at ITU-R level.”

For these reasons, EI proposes the following modifications to “*Rational*”.

Rationale:

One of the decisions taken at WRC-23 is the draft Agenda for the next World Radiocommunication Conference (WRC). As a first step, RSPG should start to identify key elements (Agenda Items) of relevance for EU spectrum policy as early as possible in the preparation process for the next WRC (WRC-27), similar to the processes successfully carried out for past WRCs.

A review of the WRC-23 results should provide a follow-up of the “Council Decision on the position to be taken on behalf of the European Union in the International Telecommunication Union World Radiocommunication Conference 2023”.

The RSPG should as a second step prepare recommendations for European Union position(s) on items which are of particular importance for EU policies for the RSPG opinion on the WRC-27 in the next Work Programme cycle, **considering frequencies where harmonisation it is possible and where it is not possible.**

“Good offices” to assist in bilateral negotiations between Member States

No comment.

Long-term vision for the upper 6GHz band (2030 and beyond)

The 6 GHz band is currently allocated to Fixed Service and it is intensively used for fixed video links in many European countries. This band is crucial to guarantee a proper delivery in digital terrestrial television platform. Any consideration on a different future use of this band needs to guarantee protection of incumbent services.

On this basis EI proposes the following modification in the “Rationale”.

The upper 6 GHz band (6425-7125 MHz) is currently subject to competing industry demands – on the one hand for high power licenced mobile use (WBB ECS) and, on the other hand, for low power unlicensed WAS/RLAN use. The incumbent services and applications including those below primary status ~~should~~ **shall** be taken into account.

6G strategic vision

Any request for new spectrum allocation for frequencies below 1 GHz needs to be accompanied by a careful assessment of the correct use of the already assigned spectrum. No other spectrum below 1 GHz should be assigned to services that can be reorganize with an improvement of efficiency of resources already allocated.

While a further reduction beneath 694 MHz of the broadcasting spectrum for mobile would endanger the survival of this technology beyond 2030, at the same time the benefits for mobile applications are modest and a better use and reorganisation of 694-960 MHz bands would better fit the purpose.

On this basis EI proposes the following modification to the second sentence of the “Rationale”.

Also, this work intends to address the long-term spectrum availability and the implementation strategies for 6G that could be considered taking into account the European influence to the international environment. Furthermore, the RSPG noted the need to assess spectrum requirements for an introduction of 6G in the EU including evaluation of coverage and capacity needs for 6G use cases, **a reorganisation of existing allocation frequencies to obsolete services (2G and 3G)**, and usages scenarios. This should respond to capacity/coverage needs, eco-systems including for terminals, timing for making available spectrum, etc. and need for a coordinated and common timing in order to provide availability of harmonized spectrum in Europe taking into account the challenge of launching 6G at a time where most terminals will not be 6G-compatible. RSPG intends to further assess the impacts of technology neutrality within harmonized bands, national mobile operators’

strategy on the timing of launch of 6G, taking into account various factors such as competition and market demand, availability of spectrum resources, expiration dates of existing authorizations.

On the same basis EI proposes the following modification to “Planned type of deliverable”.

Planned type of deliverable:

- RSPG Report on 6G strategic vision, including the evaluation **of effective use of already allocated spectrum**, coverage and capacity needs for 6G use cases and usages scenarios with initial considerations on the 6G spectrum vision.

Assessment of future usage of the frequency band 470-694 MHz within the EU

EI shares the results of RSPG in its “Opinion on the strategy on the future use of the frequency band 470-694 MHz beyond 2030” where it concludes that a *“common path for all Member States seems difficult even after 2030, due to different national spectrum needs and cross border issues”*.

Based on its Opinion on UHF, it is essential that RSPG continues the work undertaken with the aim to contribute to the process of UHF regulatory framework review by 2025 considering the followings:

- The need to examine latest developments and trends that are relevant to the current and future use of the 470-694 MHz band and to report on:
 - o how universal and free-of-charge audiovisual media services are offered in European Member States.
 - o The evolution of UHF band broadcasting reception, including factors such as the number of programs, the content format (HD/UHD) and technological advancements (e.g. DVB-T2/HEVC, 5G Broadcast).
 - o The increasing value to be attributed to broadcasting for its characteristics of *non-profiling by design*.
 - o There are European Countries where digital terrestrial television represents the first digital audiovisual media (at the end of 2022 DTT maintains a weekly reach of 80% among European citizens and an average watching time of 3 hours and 22 minutes per day – EBU Audience Trends Television 2023).
- Explore how different scenarios can coexist in EU Member States, also considering the effective implementation of Decision (EU) 2017/899 Article 4.

EI welcomes a public consultation, confident that RSPG and European policy makers will consider all views and not only technical but also politic, social, economic, cultural and international aspects affecting the use of 470-694 MHz band.

For the aforementioned reasons, EI suggests the following modifications to the “Scope of RSPG activity”.

Scope of RSPG activity:

The RSPG should continue to monitor EU Member States initiatives on the future usage in their frequency band 470-694 MHz, **considering not only technical but also politic, social, economic, cultural and international aspects affecting the use of this band.**

In consequence, based on its recent Opinion on UHF:

1.The RSPG should carry out an assessment of the prospects for the use of the sub-700 MHz band in the decade 2030-2040 by the different Member States **based on:**

- **how universal and free-of-charge audiovisual media services are offered in European Member States.**
- **The evolution of UHF band broadcasting reception, including factors such as the number of programs, the content format (HD/UHD) and technological advancements (e.g. DVB-T2/HEVC, 5G Broadcast).**
- **The increasing value to be attributed to broadcasting for its characteristics of non-profiling by design.**
- **An effective review of digital terrestrial television usage in European countries considering that the presence in a household of other media, such as satellite or IP, does not represent either an alternative or an override of digital terrestrial platform watching.**

and should make recommendations to support these initiatives,

1 bis. Explore how different scenarios can coexist in EU Member States, also considering the effective implementation of Decision (EU) 2017/899 Article 4.

2.RSPG should also collect lessons from early initiatives from Member States introducing other usages than broadcasting to address audio PMSE long term developments in order to preserve sufficient spectrum for audio PMSE needs, taking also into account the transition of audio PMSE towards new spectrum efficient technologies.

The RSPG also should gather information from industry stakeholders on expected technological developments in both mobile and broadcasting platforms.