



CONFINDUSTRIA RADIO TELEVISIONI

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Confindustria Radio Televisioni response to the Public Consultation on RSPG Work Programme 2024 and beyond

Confindustria Radio Televisioni (CRTV) is the association of Italian public and commercial radio and television broadcasters.

Established in June 2013, CRTV includes among its members: Discovery Italia, Elemedia (GEDI), GMH, La7, Mediaset, Persidera, Prima Tv, Qvc Italia, Radio Italia, CN Media, RAI Radiotelevisione Italiana, Gruppo 24Ore, RDS – Radio Dimensione Suono, Rete Blu, RTL 102,500 Hit Radio, Sportcast, Tivù, Viacom International Media Network Italia, El Towers. Satellite operator Eutelsat Italy is an aggregated member. Major local TV and radio broadcasters are represented in CRTV through the Association of Local Televisions and the Association of Local Radios FRT.

The sector has overall revenue of about 9,8 billion euros and a workforce of approximately 90,000 employees, of which about 30,000 direct (CRTV estimates).

CRTV's goal is to represent the broadcasting industry as a whole at the institutional, legislative and contractual levels.

CRTV collaborates with all competent Ministries, Political Institutions, and Regulators, both at national and EU level. The Association's activities are aimed at contributing to the creation and maintenance of fair rules that allow the sector to grow, innovate and continue to play its important role in the modernization process of the country.

BROADCASTER TV:

Discovery Italia Srl
Gmh Spa
La7 Spa
Mediaset Spa
Qvc Spa
Rai Spa
Rete Blu Spa
Sportcast Srl
Viacom International
Media Network Italia Srl

RADIO NAZIONALI:

Cn Media Srl
Elemedia Spa
Gruppo Sole24 ore
Radio Dimensione
Suono Spa
RadioMediaset Spa
Radio Italia Spa
Rai Spa
RTL 102,500 Hit Radio Srl

EMITTENZA LOCALE:

Associazione Tv
Locali
Associazione Radio
FRT

PIATTAFORME

SATELLITARI:

Eutelsat SA
Tivu Srl

OPERATORI DI

RETE:

El Towers Spa
Elettronica
Industriale Spa
Persidera Spa
Prima Tv Spa
Rai Way Spa

PARTECIPAZIONI IN:

Confindustria
Auditel
IAP
AER
Eurovisioni
Osservatorio TuttiMedia
ITU - International
Telecommunication
Union

CRTV thanks RSPG for the opportunity to comment on the draft Work Programme for 2024 and beyond and hopes to play a collaborative role with RSPG with reference to the crucial role of UHF 470-694 MHz band for the continuity of universal free-of-charge diffusion of audio-visual media services in many European Member States.

CRTV's answer will focus on "Assessment of future usage of the frequency band 470-694 MHz within the EU" and the relationship between this work area and the others.

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 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.

Existing text, deleted text , inserted new text .

Peer review and Member States cooperation

Considering

- Work area "*Assessment of future usage of the frequency band 470-694 MHz within the EU*" and

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

- 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,

CRTV 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 EEC 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) EEC (published each February).
- Informal Award Workshops on upcoming and past awards.
- Stakeholder Workshops on awards and/or other relevant topics, as appropriate.
- **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, CRTV 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 CRTV 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 CRTV 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 CRTV 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

CRTV 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.

The CRTV 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, CRTV 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.

Strategic Spectrum Matters

No comment.