

DIGITALEUROPE RESPONSE TO CONSULTATION ON DRAFT RSPG OPINION ON A LONG-TERM STRATEGY ON THE FUTURE USE OF THE UHF BAND (470-790 MHZ) IN THE EUROPEAN UNION

Brussels, 12 January 2015

DIGITALEUROPE would like to thank the RSPG for the opportunity to comment on its draft opinion on a long term strategy for the UHF band. DIGITALEUROPE is in a unique position to assess the challenges and opportunities related to the UHF band as its members span both the broadcast and telecommunication industry. Our opinions are the results of several years of discussion and exchange between our members, trying to identify a win-win approach between the two communities.

Conditions for successful TV technology transitions

DIGITALEUROPE wants to draw the attention of the RSPG to the necessary conditions to introduce any new technology in the market as stated in Annex 2 - *Agreed transition roadmap* - of the report by Pascal Lamy - *Results of the Work of the High Level Group on the Future use of the UHF Band (470-790 MHz)*.

DIGITALEUROPE highly values the expressed ambition of the European Commission to modernize the DTT platform and its CE industry members are pleased to endorse this objective with newer technologies. In this context we would like to clarify the following:

- The natural replacement cycle of TV sets is between 7 and 10 years. During the period between the start of the introduction of a newer technology and completion of replacement:
 - The loss of audience discourages DTT broadcasters to switch over before a sufficient penetration is reached.
 - Long simulcast periods result in a costly undertaking which is an option excluded by broadcasters.
 - If broadcasters wait until the equipment reaches a high penetration, the technologies may be superseded by then¹. There is a risk that receiver manufacturers are in the situation to integrate technologies which have no value to the user, have a cost impact and may be never used and cannot promote their future-proofness with respect to future services.
- From several experiences in various Member States, the sole mandate of technologies alone is rather counterproductive. A technology mandate needs to be synchronized with new added value services, information campaigns and clear timelines. These may be complemented by subsidies for vulnerable persons.

¹ As an indication, technology cycles in DVB of codecs and transmission systems are in the order of 10 years each, together 5 years.

DIGITALEUROPE concludes that the natural replacement cycle needs to be leveraged – but is not sufficient – for a successful migration. DIGITALEUROPE sees the need for synchronizing any obligation to integrate newer technologies in receivers with:

- obligations or/and funds to produce new associated content formats like UHD
- a start of services with a minimum percentage corresponding native formats²
- Associated information or marketing campaigns.

Obviously, for those countries which have, or are about to generalize HD services, additional HD services alone may not be sufficient to motivate the consumer. A proactive approach for UHD seems to be more appropriate to provide to right incentive to the market.

Support for SDL

In 2013 already, DIGITALEUROPE published a position paper³ recommending repurposing the 694-790 MHz band for Mobile Broadband (MBB) whilst carefully managing the impact on consumers and their legacy equipment.

In the context of the High Level Group on UHF, DIGITALEUROPE proposed to further investigate Supplemental Downlink (SDL) as a flexible way to allow for MBB use in 470 - 694 MHz before 2030 while protecting DTT in the band. DIGITALEUROPE applauds RSPG for building its opinion on the basis of the work previously conducted in several working groups, including the HLG.

DIGITALEUROPE invites the European Commission, the CEPT and the RSPG to thoroughly explore the scenario of SDL for mobile services in the 470 – 694 MHz band as this would provide a step towards and a catalyst for the development of further convergence between mobile services and the delivery of broadcast content. DIGITALEUROPE endorses and offers to work together with respective stakeholders to study acceptable and mutually beneficent frequency usage, license conditions and coexistence conditions in 470 - 694 MHz. Such explorative projects should not interfere with the 700 MHz release and the LTE700 deployments. While studies can commence any time, actual results may only be achieved after the re-purposing of the 700 MHz band to MBB.

The full position of DIGITALEUROPE on the long-term strategy on the future use of the UHF band is best reflected in DIGITALEUROPE's White Paper on Supplemental Downlink in the UHF band⁴.

² French HD services start were synchronized with law on AVC integration and were associated with obligation to air native HD content

³ http://www.digitaleurope.org/DocumentDownload.aspx?Command=Core_Download&EntryId=522

⁴ http://www.digitaleurope.org/DocumentDownload.aspx?Command=Core_Download&EntryId=893

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ABOUT DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies.

DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 59 corporate members and 36 national trade associations from across Europe. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

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