



Wider Spectrum Group  
Frequencies for a creative Europe



## Response to the Public consultation on the Draft RSPG Opinion on the ITU-R World Radiocommunication Conference 2019

(Final - 19 July 2018)

The Wider Spectrum Group<sup>1</sup> welcomes the opportunity to provide comments on the draft RSPG Opinion on the ITU-R World Radiocommunication Conference 2019.

The Wider Spectrum Group (WSG) calls for European Policy makers, preparing for WRC-19, to stay the course initiated by EU's strong stance in defense of its Creative and Cultural Industries at WRC-15 and build on the long term EU spectrum strategy set one year ago in the Decision 2017/899 on the use of the UHF Band.

The creative and cultural sector, acknowledged as a leading employer and value driver in Europe, deserves a strong industrial strategy that reinforces the pillars it rests on. Spectrum allocation is one of those pillars. Free-to-air radio and TV, live performance and PMSE make available to the general public local, diverse and plural European works and information.

In particular, access to the UHF band is vital for upholding European values and fostering the cultural and creative sector growth and jobs.

Therefore our comments are focused on the two sections which might impact the UHF band as a core band for the creative and cultural sector.

### Section 4.1 General Objective

Following the decisions taken at WRC-15, the UHF Band is not at the agenda of WRC-19 and the WSG is not aware of any regional organisation proposing otherwise.

However, RSPG has identified in section 4.1 the risk of WRC Agenda changes at a very late stage.

**Therefore the WSG calls for the RSPG to remain alert during the preparatory process of WRC-19 to ensure if needed that the EU Member States and the Commission will oppose any change to the WRC-19 agenda that could affect the UHF Band allocation in Region 1.**

### Section 4.12 Agenda Item 10 (New Agenda Item for WRC-23)

1) A review of the spectrum use of the frequency band 470-960 MHz in Region 1 at WRC-23 has already been agreed in the ITU as part of WRC-15 resolutions. While the WSG is certainly not asking for that review, this cannot be changed without reopening a debate in WRC-19. Therefore the WSG supports the RSPG recommendation in 4.12.3 to stick to the agreed agenda wording, which includes a review of the use of the full 470-960 MHz band before considering any possible regulatory action in accordance with Resolution 235 as drafted at WRC-15.

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<sup>1</sup> A description of the Wider Spectrum Group and its members is provided in appendix

It will be essential that the studies following WRC-19 take a balanced approach, focusing on future needs of both broadcasting and the mobile sector, recognising the diminishing demand for UHF for mobile telecommunications<sup>2</sup> and the scope for significant efficiencies in current allocations in bands above 700MHz<sup>3</sup>.

**The WSG emphasises the key responsibility of Policy Makers during the upcoming ITU study process to stay the EU course which allocates for the long term the 470-694 MHz band as the core spectrum band of the European creative and cultural industry.**

2) As an editorial remark, the WSG notes that Decision (EU)2017/899 is not limited to the 700 MHz band, but also harmonises in the EU the 470-694 MHz band for the terrestrial provision of broadcasting services, including free television, and for use by wireless audio PMSE. **Therefore we suggest to modify subsection “4.12.2 relevant spectrum harmonization decisions” as follows** (added words are emphasised in bold):

**470-790 MHz-** Decision (EU) 2017/899 of the European Parliament and the Council of 17 May 2017 on the use of the 470-790 MHz frequency band in the Union

700 MHz –Decision (EU) 2016/687 ...

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<sup>2</sup> Ofcom reports ‘substantially diminished’ demand for UHF spectrum for mobile  
[https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0026/111896/Public-service-broadcasting-in-the-digital-age.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0026/111896/Public-service-broadcasting-in-the-digital-age.pdf)

<sup>3</sup> Aetha Consulting – ‘The defragmentation dividend’  
[http://www.digitaluk.co.uk/\\_data/assets/pdf\\_file/0016/93400/Aetha\\_Consulting\\_-\\_The\\_Defragmentation\\_Dividend\\_15\\_November\\_2017.pdf](http://www.digitaluk.co.uk/_data/assets/pdf_file/0016/93400/Aetha_Consulting_-_The_Defragmentation_Dividend_15_November_2017.pdf)

## Appendix - About the Wider Spectrum Group

Founded on January 2015, the Wider Spectrum Group (WSG) now brings together 9 European and 6 national organisations representing civil society as well as employee and employer representatives. Together these organisations represent the interests of listeners and viewers, workers and businesses in the field of audiovisual, radio, live performances, programme-making and special events.

WSG members share [a common view](#) on the need to ensure that European and national policies regarding frequency allocation preserve the potential for European growth, innovation and sustainable employment.

European and global organisations:

- AER (the association of European radios)
- APWPT (the association of professional wireless production technologies)
- BNE (broadcast networks Europe)
- CEPI (the European coordination of independent producers)
- EBU (the European broadcasting union)
- Euralva (the European alliance of listeners' and viewers' associations)
- EFJ (the European federation of journalists)
- Pearle\* Live Performance Europe (the European sector federation of performing arts organisations)
- UNI-MEI (the global union of media and entertainment workers' trade unions)

National organisations

- AUC (the association of communication users, Spain)
- Digital UK (strategy, policy and service development for digital terrestrial television in the UK)
- IcMedia (the Spanish federation of consumers and media users association)
- Uteca (the Spanish association of the private owned DTT broadcasters)
- VLV (Voice of the listener and viewer, UK)
- VAUNET (Association of Commercial Broadcasters and Audiovisual Services in Germany)

[Click here to learn more about the Members of the Wider Spectrum Group](#)