

## **BNE Consultation Response**

Broadcast Networks Europe (BNE)<sup>1</sup> welcomes the opportunity to submit a consultation response and share its views on the (Draft) RSPG Work Programme for 2024 and beyond.

BNE's main interest point would be the *Assessment of future usage of the frequency band 470-694 MHz within the EU*.

BNE represents the infrastructure providers at European level and is further investing and improving on expected technological and service developments in the broadcasting platforms, including UHD and 5G Broadcast. We will be more than happy to respond to RSPG questionnaire or actively participate in workshop initiatives as envisaged in the draft RSPG work programme.

BNE is of the view that, if the [Broadcasting innovation roadmap](#) is to be developed during the second part of the decade and the network investments are to be made, long term certainty is needed even far beyond 2030. Also, we do firmly believe that the outcome of the WRC23 provides certainty for further broadcasting developments alongside the exploration of additional and compatible flexible uses of the spectrum, demonstrating that the shared use of the 470-694MHz is of a paramount relevance for providing the maximum benefit to European citizens.

More generally, BNE remains open and available to maintain a dialogue with RSPG and any other relevant body to further discuss and explore the value and contribution of Digital Terrestrial Television and its key role for building the future of Europe. We already highlight some of the elements in the general comments which follow.

### **The BNE point of contact for any questions or further clarifications is:**

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<sup>1</sup> BNE represents Europe's terrestrial network operators in Europe and internationally. Terrestrial broadcast operators are responsible for managing and maintaining infrastructure, TV network design, multiplexing, distribution, transmission and carriage deliver so that TV, radio and other over-the-air services can reach their audiences. We are securing for 250 million European viewers universal access to the over-the-air services, radio and TV that they watch and enjoy for more than 3h30 on average per person per day.

BNE's 18 members are operating in 20 European countries: Austria, Belgium, Croatia, Czech Republic, Estonia, Finland, France, Germany, Greece, Ireland, Italy, Norway, Poland, Romania, Serbia, Slovakia, Spain, Switzerland, UK and Sweden.

## General comments

BNE welcomes the RSPG Draft 2024 Work Programme presenting 2024 RSPG roadmap, which includes some expected discussions that would have long term impact for the European spectrum usage, networks development, industry investments and, more importantly, citizens life. All these discussions and eventual additional proposals arising are expected to be in line with the new Parliament emerging from 2024 elections and with the European Commission. Indeed, one of the key topics for the next years to come in Europe would be to ensure the sovereignty and resilience of the EU. At this regard, European policymakers should be cautious about its decisions and the impact on all European way of life, considering all proposals, country needs and finding a balanced way forward.

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 sustainability.

As a critical infrastructure, DTT strengthens European sovereignty providing resilience to keep Europe safe, securing a functioning society in times of crises and emergencies to reach out to citizens. Also, DTT sites are highly protected from any threat or cyber-attacks, guaranteeing a top level service continuity.

On the other hand, when taking decisions on spectrum, social, political, cultural, economic, technical, environmental and general interest aspects are to be properly considered. These are key aspects that need to be considered as part of any review of the future use of any band and specifically the UHF band. Indeed, fully acknowledging that the national situations may be different, the importance of DTT does also require a European viewpoint to address the previous aspects.

To keep exchanging on the societal value provided by the European Broadcasting industry, BNE and its members would be keen to further discuss and to participate on any of the envisaged workshops and activities envisaged on the Draft RSPG Work Programme 2024.

BNE's main interest point would be the *Assessment of future usage of the frequency band 470-694 MHz within the EU*. Representing the infrastructure providers and acting as heavy investors, BNE is to be considered one of the key stakeholders at European level for the matter and we would be more than happy to further collaborate with RSPG and other policy makers when needed at this regard. No matter which would be the outcome of the WRC23, if the [Broadcasting innovation roadmap](#) is to be developed during the second part of the decade and the network investments are to be made, long term certainty is needed even far beyond 2030.

We firmly believe that if EU27 have been able to find a common position acceptable for all Member states in preparation for WRC23, RSPG and EU27 policy makers expertise and balanced approach will find a compromise avoiding harming any industry, sector and citizen on a post 2030 scenario. Also, the development of the flexibility defined in Article 4 of Decision (EU) 2017/899 is a key element to be considered and where the development of new and innovative technologies such as 5G Broadcast may play a role. The advantages of 5G Broadcast should not go unmentioned at this point:

- a) 5G Broadcast automatically relieves the data traffic. Regardless of how many people are watching the respective stream, 5G Broadcast guarantees the highest quality for many viewers.
- b) Linear broadcasting content is distributed directly to mobile devices such as smartphones or tablets – without the need for Wi-Fi or the Internet.
- c) The IP capability of 5G Broadcast enables for the first time, full convergence in the networks (broadcasting and mobile network), which will lead to a further increase in efficiency in the future.
- d) Unlike streaming, no internet is required for reception on 5G broadcast-capable devices, which means that mobile TV does not reduce the customer's data volume. Thus, all consumers benefit.
- e) In a European comparison, linear television already performs far better on average than OTT platforms and IPTV-based distribution networks. Likely, 5G Broadcast will achieve even greater CO2 savings.
- f) We also see the potential to open the UHF band for new all-IP downlink-only ancillary services, including downlink-only ancillary services for licensed media providers (e.g., scheduled content) and new downlink-only ancillary services (e.g., emergency warning systems) under EU or national flexibility programs.

BNE will be at RSPG disposal for all other issues, mainly the WRC and Strategic Spectrum Matters.

Find below two annexes with additional information on the value and contribution of DTT for Europe and its contribution to the Digital Rights and Principles for the Digital Decade

Finally, BNE and its members remain at RSPG disposal for any additional issue of interest to be discussed.

## Annex I: The value and contribution of Digital Terrestrial Television, a key asset for building the future of Europe.

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.

For this reason, BNE has 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 sustainability<sup>2</sup>.

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

- **Sovereignty and resilience**

As a critical infrastructure, organized in nationwide networks and operated under national licenses, DTT is an asset that strengthens European sovereignty. At the same time, DTT infrastructure provides resilience for the broadcasters and the other multiple services using it. This turns DTT into the best platform to keep Europe safe, securing a functioning society in times of crises in the easiest way.

In any emergency, terrestrial broadcasting provides a key resilient network to reach out to citizens and support the work of emergency and rescue services, which often operate their own internal communication systems on the DTT infrastructure.

Not only DTT sites are highly protected from any threat but also highly resilient to cyber-attacks, guaranteeing service continuity at a level that cannot be matched by online distribution.

Overall, DTT delivers TV services to everybody with no bottlenecks and no buffer even in peak time, securing a high-quality access to all viewers regardless of their location.

- **Innovation**

Based on its vision for Europe beyond 2030, broadcast network operators have recently unveiled their own innovation roadmap<sup>3</sup>.

This includes the launch and development of several new technologies that would not only create the linear TV experience of the future but also blend linear and on demand services for a seamless and easier viewing experience.

Within this roadmap, 5G Broadcast combines broadcast and unicast technologies, not only promoting a better user experience on mobile devices but also a more efficient use of the spectrum.

The DTT network will offer a seamless access to linear and on demand contents, making viewers’ lives easier via technologies such as HbbTV and DVB-I.

This commitment to innovation is complemented by the increasing spectral efficiency enabled by two factors: the transition from DVB-T to DVB-T2 and the use of more efficient video compression codecs such as HEVC and VVC.

<sup>2</sup> More information can be found at: <https://broadcast-networks.eu/building-the-future-of-europe-the-value-and-contribution-of-digital-terrestrial-television/>

<sup>3</sup> More information can be found at: <https://broadcast-networks.eu/european-cultural-band-an-innovation-roadmap-for-the-lower-uhf-band/>

As a result, DTT will enable the delivery of higher quality services and pave the way for the introduction of 5G Broadcast.

This technical evolution of the DTT network will not be at the expense of other services, rather the opposite: this innovation roadmap plans to maintain the track record of terrestrial broadcast services in spectrum sharing with other key services such as PMSE for media and cultural production, radio astronomy and the military.

- **Democracy**

While democracy is often taken for granted in Europe, it needs to be nurtured, strengthened and promoted. Terrestrial broadcasting services already do that by enabling a direct connection, without gatekeepers, between broadcasters and citizens.

Among all media, broadcasters are a primary source of trusted information, thus greatly contributing to the required public debate to keep democracy healthy.

The license system built upon DTT infrastructure guarantees quality news, pluralism and freedom of speech. It is also an effective tool in the urgent fight against misinformation that threatens democracy.

Consequently, a weakened DTT or its switch-off would diminish the ability of national decision-makers and regulators to use public policies to shape the development of media and communication services. As a result, a broad array of public goals aiming to create a more fair and diverse society would not be achieved.

Overall, DTT broadcasters are key contributors to the health and dynamism of the national public sphere. Thanks to their nationwide footprint and the content they carry, these broadcasters enable each and all citizens to form their own opinions.

- **Creativity and culture**

Terrestrial broadcasting plays a key role in enabling a sovereign, independent and thriving European audiovisual and cultural sector thanks to its close relationship with producers and its very significant investment.

Five out of 6 € invested in European original content come from broadcasters, for which DTT is their distribution backbone.

Overall, European broadcasters annually spend nearly 38 billion € in content. This investment results in the creation of highly-qualified jobs that, by their nature, are difficult to relocate to other countries.

Not only are broadcasters the prime investors in European original content but also the main agents showcasing this content. As such, they spread culture and stories with European values at their core.

For broadcasters, DTT is more than just a robust and reliable distribution network delivering an extensive footprint, high quality of service and high reach: it is also a strategic asset. Thanks to DTT, European broadcasters secure their direct access to their viewers via a free and easy-to-use platform. Furthermore, DTT ensures their prominence and findability in an increasingly crowded offer.

- **Social commitment**

DTT's high population and territorial coverage allows broadcasters to play a key social role in European societies, preventing leaving anybody behind.

DTT brings a free-to-air and easy-to-use linear TV experience to all citizens, regardless of their age, their location or their economic, social and educational conditions.

Given its coverage rates close to 100% of the population, DTT provides an offer with a guaranteed quality of service to nearly all citizens across Europe. It secures universal access to quality information, entertainment and knowledge together with connection and companionship.

Therefore, DTT acts as a tool for inclusiveness that can be leveraged to build a more cohesive society.

The platform also champions accessibility: users with disabilities, and their families, benefit from adapted communication services thanks to the sustained efforts and investments in accessibility made by DTT broadcasters.

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- **Sustainability**

Terrestrial broadcasting is an asset for the environmental sustainability journey in which modern societies are embarked. Broadcast network operators already illustrated this through their landmark Report on Low Carbon Television<sup>4</sup>, commissioned to Carnstone.

Overall, DTT is the greenest platform for TV distribution, thanks to both its multicast nature and the passive aerial connection to access the network at households.

Additionally, the platform enables an enormous brain print by DTT broadcasters: their ability to raise awareness, change attitudes and prompt action regarding climate and the environment among audiences should be neither obviated nor underestimated.

Furthermore, dismantling an efficient and effective infrastructure of these dimensions would generate enormous amounts of unnecessary waste with a high environmental impact and a huge economic cost.

Similarly, maintaining DTT is a policy decision against both planned obsolescence of mobile devices and generation of electronic waste. The long replacement cycle of TV sets is a greener option than the shorter one of mobile devices.

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<sup>4</sup> More information can be found at: <https://broadcast-networks.eu/dtt-a-green-sustainable-platform/>

## Annex II: DTT's contribution to the Digital Rights and Principles for the Digital Decade

BNE firmly believes that DTT and the values it delivers fit perfectly to a number of the digital rights and principles as stated in the [European Declaration on Digital Rights and Principles for the Digital Decade](#).

DTT strongly supports **solidarity and inclusion**. DTT's high population and territorial coverage allows broadcasters to play a key social role in European societies, preventing leaving anybody behind. DTT brings a free-to-air and easy-to-use linear TV experience to all citizens, regardless of their age, their location or their economic, social and educational conditions. Given its coverage rates close to 100% of the population, DTT provides an offer with a guaranteed quality of service to nearly all citizens across Europe. It secures universal access to quality information, entertainment and knowledge together with connection and companionship. Therefore, DTT acts as a tool for inclusiveness that can be leveraged to build a more cohesive society. The platform also champions accessibility: users with disabilities, and their families, benefit from adapted communication services thanks to the sustained efforts and investments in accessibility made by DTT broadcasters.

DTT ensures **freedom of choice**. For broadcasters, DTT is more than just a robust and reliable distribution network delivering an extensive footprint, high quality of service and high reach: it is also a strategic asset. Thanks to this platform, European broadcasters secure their direct access to their viewers via a free and easy-to-use platform. Furthermore, DTT ensures their prominence and findability in an increasingly crowded offer.

DTT fosters **participation in the digital public space**. While democracy is often taken for granted in Europe, it needs to be. Terrestrial broadcasting services nurture, strengthen and promote democracy by enabling a direct connection, without gatekeepers, between broadcasters and citizens. Among all media, broadcasters are a primary source of trusted information, thus greatly contributing to the required public debate to keep democracy healthy. The license system built upon DTT infrastructure guarantees quality news, pluralism and freedom of speech. It is also an effective tool in the urgent fight against misinformation that threatens democracy. Overall, DTT broadcasters are key contributors to the health and dynamism of the national public sphere. Thanks to their nationwide footprint and the content they carry, these broadcasters enable each and all citizens to form their own opinions.

DTT increases safety, **security** and empowerment of individuals. The use of a highly protected network such as DTT effectively contributes to build cyber resilient critical infrastructures.

DTT is a strong contributor to the **sustainability of the digital future**. Terrestrial broadcasting is an asset for the environmental sustainability journey in which modern societies are embarked. Overall, DTT is the greenest platform for TV distribution, thanks to both its multicast nature and the passive aerial connection to access the network at households. Additionally, the platform enables an enormous brainprint by DTT broadcasters: their ability to raise awareness, change attitudes and prompt action regarding climate and the environment among audiences should be neither obviated nor underestimated. Maintaining DTT is a policy decision against both planned obsolescence of mobile devices and generation of electronic waste. The long replacement cycle of TV sets is a greener option than the shorter one of mobile devices.