

## Response of the Wider Spectrum Group to the RSPG public consultation on WRC-23 preparation

The Wider Spectrum Group welcomes the opportunity to comment on the draft RSPG Opinion on WRC-23. Our response is focused on **Agenda Item 1.5 of WRC-23**, dealing with the UHF band. Information on the 10 European and 8 national members of the coalition Wider Spectrum Group (associations, companies, and NGOs) is provided at the end of this response.

### Introduction

On the UHF Band, the EU has a coordinated approach, which has been supported by the Wider Spectrum Group as a strategic and balanced compromise found in Europe around the allocation of the UHF Band 470-790 MHz band. This is set in the EU UHF Decision, which is the foundation for a strong "No Change" EU position at WRC-23 on A.I. 1.5. The EU UHF Decision is designed to support two European industrial policies for the long-term:

- On the one hand, the decision allowed the mobile sector to harmonize the 700 MHz band to the mobile service *simultaneously* in all Member States, a major building block of the Path to the Digital Decade.
- On the other hand, as emphasized in the Lamy Report, the European Audio-Visual Model is *strengthened* by the long-term allocation of the Sub-700 MHz band to terrestrial broadcasting and PMSE (Programme Making and Special Events). creating security to invest, also in future technologies

The principles behind the UHF band allocation are balanced and in line with the general interest. They are fit for the long term. With the clearance of the 700 MHz band from broadcasting and PMSE, the frequencies for the telco sector are now delivered, consequently the frequencies in the UHF for a creative Europe must equally be secured in EU spectrum policy and in the ITU process. Those frequencies are essential to safeguard content creation and delivery through broadcasting and PMSE, for the benefit of all users (viewers and listeners) and job creation. This conviction is being underlined in Member States across Europe, as demonstrated during a recent [Call to Europe](#) on 30 June.

### Consequences for Europe

- A co-primary allocation of mobile and broadcasting in the 470-694 MHz band is not compatible with the EU UHF decision, because co-primary status establishes equal rights to 2 services known to be technically incompatible, whereas the UHF Decision recognizes in a EU coordinated approach the primacy of broadcasting in this band, which is shared efficiently with PMSE.
- **The Wider Spectrum Group strongly opposes a co-primary decision**, even if it is deferred to a later date, as envisaged in RSPG second listed option. We acknowledge that the EU may relax some obligations according to article 4 of the UHF decision after 2030, but this is not equivalent to granting new rights to new, incompatible services, at the same level as broadcasting. Recommending such a position would in our view be second-guessing the UHF Decision.

### International context

- We acknowledge that decisions at WRC-23 must consider carefully the views of all countries in Region 1. Some are known to be asking for co-primary at Region 1 level to achieve flexibility in managing spectrum needs in their respective territory.

- We think that flexibility through coprimary would come at the expense of stability for the majority of countries in Region 1. Current radio regulations, GE06 or the UHF Decision include measures of flexibility which could in a proportionate manner satisfy the minority of countries wanting to introduce other uses in the sub 700 MHz band.
- As we call for a firm EU position in favor of "No Change" for WRC23, we ask RSPG to exclude to rediscuss in WRC-27 as this might convey to other countries a signal that EU position is hesitating or on the verge of shifting.

## Conclusion

**Among the options considered by RSPG, the first one with No Change with a possible agenda item for WRC-31 is the most aligned with the interest of the European viewers and listeners, workers and companies in the Content and creative industry. While the Wider Spectrum Group is not asking for another discussion in 2031, the Wider Spectrum Group believes that this option of RSPG would respect the EU UHF Decision.**

About the Wider Spectrum Group ([widerspectrum.org](http://widerspectrum.org)):

Created in 2015, the Wider Spectrum Group (WSG) brings together 10 European and 8 national organisations representing civil society as well as employee and employer representatives.

- Trade associations and companies in audio, audiovisual and film creation, production and distribution; in radio and tv (broadcasting); in live performance, programme making and special events;
- Viewers, listeners and consumer organisations;
- European trade union organisations representing journalists, creators, technicians and other works in the media, entertainment, and arts.

Those organisations 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 organisations: AER, APWPT, BNE, CEPI, EBU, EFJ, EURALVA, PEARLE, SOS, UNI MEI

National Organisations : AUC, Digital UK, ICMEDIA, SPIO, Television Abierta, UTECA, VAUNET, VLV



**For more information on the Wider Spectrum Group, its members and common vision, see [www.widerspectrum.org](http://www.widerspectrum.org)**

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