

Answer to the Call for Evidence on World Radiocommunication Conference 2023

The Wider Spectrum Group welcomes the opportunity to provide feedback to this call of evidence regarding the preparation by the Commission of an EU position to be adopted by the Council for WRC-23.

One of the subjects at the agenda of WRC-23 is the possible regulatory evolutions in the Sub-700 MHz band (470-694 MHz). Those frequencies are essential to secure content creation and delivery through broadcasting and PMSE, for the benefit of all users (viewers and listeners).

On the allocation of the UHF Band 470-790 MHz band, the EU has defined a coordinated approach, which has been supported by the Wider Spectrum Group as a strategic and balanced compromise. 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, the European Audio-Visual Model is *strengthened* by the long-term allocation of the Sub-700 MHz band to terrestrial broadcasting and PMSE in the EU.

The principles behind the UHF band allocation in the EU are balanced and in line with the general interest. They are fit for the long term. The frequencies for the telco sector are delivered, consequently the frequencies in the UHF for a creative Europe must equally be secured in EU spectrum policy and in the ITU process.

In this matter where the EU long-term policy is defined with no ambiguity by a recent co-decision¹ of the Parliament and Council, it is essential that Europe speaks with one voice in international negotiations. The preparatory process described by the Commission in this call for evidence is very important. The Wider Spectrum Group is calling for the Commission, EU institutions and Member States' representatives to actively support at WRC-23 a No Change to the Radio Regulations affecting the 470-694 MHz band, and to oppose a co-primary allocation to mobile, even with a deferred entry into force.

Additional evidence is available in the [Wider Spectrum Group shared vision](#) and will be also developed in response to the ongoing [RSPG public consultation](#) and along the preparation of the Council Decision.

About the Wider Spectrum Group (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 audiovisual and film creation, production and distribution; in radio; 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.

¹ [Decision \(EU\) 2017/899](#) of the European Parliament and of the Council of 17 May 2017 on the use of the 470-790 MHz frequency band in the Union

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



Wider Spectrum Group

Frequencies for a creative Europe

