

## **The Wider Spectrum Group asks the European Commission, the Council and CEPT to preserve the current UHF Band allocation by defending No Change at WRC-23**

28 March 2023

**While recognizing the value of the opinion by RSPG in view of envisaging a compromise with the minority of Region 1 countries who insist on a change in regulations, the Wider Spectrum Group calls on the European Commission to propose to the Council to oppose co-primary allocation and support “No Change” in the allocation of the UHF Band at WRC-23.**

**Regarding any possible agenda item at WRC-31 impacting the European cultural band 470-694 MHz band, the Wider Spectrum Group calls for a neutral wording, therefore modified as follows "with a WRC-31 Agenda Item to consider a possible review on the spectrum use and spectrum needs of existing services in the frequency band 470-960 MHz in Region 1 and with possible regulatory actions in the frequency band 470-694 MHz band, based on the review".**

Frequencies within the UHF band are essential to secure European content creation and delivery through broadcasting and PMSE, for the benefit of all users – viewers and listeners. Moreover, the current spectrum allocation supports a democratic and safer Europe. by ensuring quality news, pluralism and freedom of speech through trusted and regulated media, available free-to-air, and through local events and debates.

The balance found in Europe for the allocation of the UHF spectrum is at risk of being disrupted if the remaining spectrum for broadcasting and PMSE is open to the mobile service at the ITU level. Such a change in regulation would have immediate and damaging effect on sectorial investment and innovation, and wide-reaching ramifications for the longer term: no UHF spectrum means no terrestrial TV for universal service, the most energy-efficient platform, currently serving 80 million EU households and sharing much infrastructure with radio which would be put in danger too; it means no live events, eg. concerts, and much less content creation and associated jobs.

For that reason, the Wider Spectrum Group has called for a firm EU position against co-primary allocation to mobile and in favour of "No Change" in the allocation of the UHF band at WRC-23.

On 9 December 2022, the Radio Spectrum Policy Group (RSPG) adopted its opinion on the WRC-23. The Wider Spectrum Group would like to make the following points on this opinion:

1. The Wider Spectrum Group notes the RSPG’s reminder that the EU position must be compliant with EU law, in particular the EU UHF Decision 2017/899 which is a strategic and balanced compromise found in Europe around the allocation of the UHF Band 470-790 MHz.
2. In that respect, the Wider Spectrum Group welcomes that the compromise solution identified by RSPG<sup>1</sup> excludes the option of co-primary allocation to mobile at WRC-23.
3. The Wider Spectrum Group also notes that the potential compromise identified by RSPG respects the period of regulatory certainty which is an important part of the EU UHF Decision, by excluding any discussions before WRC-31.
4. RSPG proposes a change in the international radio regulations by identifying a secondary allocation to mobile. This is a significant change in the direction of what is being asked by some countries, ie having a ITU recognition of other uses than broadcasting in response to national needs.
5. The Wider Spectrum Group is wary that the introduction of mobile services on a secondary basis in some countries is very likely to have a negative impact on the PMSE sectors of those countries even if it does not endanger broadcasting and PMSE in neighbouring countries.
6. Finally, the Wider Spectrum Group is concerned by the proposed wording for WRC-31 Agenda item in the RSPG opinion: such a wording is biased in favor of considering an upgrade to primary status for mobile services, an option which is absolutely not part of the UHF Decision. Such wording would create an unbalanced entry point for negotiations at WRC-31 and even at this WRC-23.

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<sup>1</sup> “The RSPG identified a potential compromise solution to be recommended as an EU position. In consequence, the RSPG is of the view that the above outline recommendation can be ensured by an EU position supporting a secondary allocation to the mobile, except aeronautical mobile, service with a WRC-31 Agenda Item to consider a possible upgrade of the secondary mobile allocation.”

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, Everyone TV, IC MEDIA, SPIO, Television Abierta, UTECA, VAUNET, VLV



## Wider Spectrum Group

Frequencies for a creative Europe

