



Wider Spectrum Group
Frequencies for a creative Europe



Staying Course: pursuing a European industrial strategy for creative and cultural industries based on growth, innovation and jobs

A shared vision from the members of the Wider Spectrum Group

(updated June 2018)

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.

European leaders have emphasized as their two top priorities “A New Boost for Jobs, Growth and Investment” and “a Connected Digital Single Market” [1]. The cultural, creative and media industries are an essential pillar of the digital economy and one of the key assets of Europe Digital Single Market Strategy, in every dimension:

- Accounting for 6.8% share of GDP (€860 billion) and 6.5% of Europe’s employment (approximately 14 million direct and indirect jobs) [2];
- Combining the forces of flagship European-based companies competing in a global market alongside more than 1.4 million small and medium sized enterprises [3] (who generate over 80% of the total revenue for the sector);
- Employing a highly skilled, non-offshorable and well-educated workforce that is deeply rooted within local territories, economies and cultures;
- Creating and investing in digital platforms and technological innovations; Europe's digital market for cultural products and services is providing more and more choice to consumers.

European enterprises and employees from the creative and cultural industry stand together at the forefront of Europe’s fresh start to provide more growth and jobs for Europeans, united around:

- **A vision** for its future digital economy and society that integrates all existing components to optimise opportunities and potential rather than drive fragmentation and conflict between sectors and players;
- **A strategy** that embraces cultural diversity and pluralism as valuable assets in the EU;
- **A commitment** to enshrine fair access and support for creation, innovation and finance.

EU policy-makers in close consultation with all stakeholders and civil society need to pursue a European industrial policy, which does recognise the cultural, creative and media industries as a growth enabler for Europe and as a key component of European construction. This means policies that:

- **Acknowledge the business, investment and funding [4] models** for the works produced; including content creation, distribution and licensing models that ensure sustained levels of efforts and investments in content from employees and enterprises; and infrastructure investments to spark innovations that meet evolving EU audience expectations;

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- **Uphold the importance of local/national works [5]** as supporting European employment, diversity and plurality with a thorough consideration of the added value these industries, driven by broadcasting and live performance sectors, create through contextualising works [6] and investing [7] for citizens;
- **Enshrine guaranteed access to critical resources such as spectrum** for services that enable and sustain Europe's creative and cultural industry, to maintain free-to-air as a capacity for citizens to participate in the public discourse, have choice and preserve their local identity.

Europe's preference - Low cost, accessible, local, reliable, regulated, plural

250 million Europeans choose television via the digital terrestrial television (DTT) broadcasting platforms as one of their preferred means of media consumption. 80% of the EU population listens to the radio for at least 2 to 3 hours a day, mostly through broadcasting (analogue and digital). Traditionally and increasingly PMSE [8] equipment- such as wireless microphones, in-ear monitors and cordless cameras and backstage communications equipment, vital for safety, in operation by production teams - is used to create this content for broadcast and in live performance.

Television and radio are the most intimate, most trusted and most economic rational means to address the reality of national identities and to uphold Europe's unique, comprehensive and virtuous model. This model spreads the production base across Europe creating jobs and growth. Broadcasting platforms, and in particular DTT and radio platforms, will continue to play a crucial role in delivering linear broadcast content to European citizens.

This diversity of supply ensures a diversity of choice to Europeans allowing for platform competition, innovation and investment over the long-term. Reducing spectrum for content creation and terrestrial broadcasting has far-reaching consequences beyond just arbitrating between broadcasting and mobile. Moving away from DTT would result in a loss of €38.5 billion to the EU economy [9] before any account of losses to the creative sector.

The 2015 World Radio Conference in Geneva, and the overwhelming majority of nations who expressed their support to maintain the present UHF allocation to broadcasting, has shown that **Europe can have its own way to express leadership for access to critical spectrum resources.**

By ensuring long term access to UHF spectrum below 700 MHz needed by the European creative and cultural industry in the 2017 EU Decision 2017/899 [10], the European Policy Makers have recognized the need for a change of mindset from platform convergence to co-existence [11], as identified in the Lamy report [12], amongst others [13]. This important political Decision acknowledges different consumer expectations, supports Europe's cultural diversity, supports original content creation, promotes media pluralism and sustains the development of inclusive audiovisual, radio and live performance sectors.

The old debate pitching mobile services against terrestrial broadcasting is now settled recognizing these services should be seen as complementary and supporting different needs. Europe is now the world leader in spectrum allocated to mobile [18], while the long term guarantee on the lower UHF Band means visibility for the creative sector at least until 2030 and beyond [10].

Mobile services ensure one-to-one communications (phone calls, mobile internet...). Terrestrial broadcasting is indispensable for spectrum-efficient one-to-many transmissions (free-to-air TV and

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radio, coverage of major live events, emergency communications...). The latter makes the platform more cost effective and self-sustaining due to the economies of scale involved with equal quality.

While the European Creative sector is a leader in creating and distributing contents in linear and non-linear modes to a variety of devices, the concept of convergence of network is not supported by a compelling business case [14] and innovation for LTE-Broadcast can be experimented at European scale in the already harmonized telecommunication bands [15] without stifling innovation for terrestrial broadcasting and threatening the existence of special events and live performance.

Europe's broadcast industry has scale and can invest to deliver high impact / quality cultural and creative works.

Scale is manifested in reach, coverage of the service, which enables low cost delivery of media works on consumer devices affordable to all. Scale raises advertising income enabling more money to be re-invested in cultural oriented creation and national / local distribution.

The benefits of terrestrial broadcasting are recognised in European law as an integral part of the general interest.

More specifically as promoting "social, regional or territorial cohesion" and "cultural and linguistic diversity and media pluralism" [16]. For many European countries, no terrestrial broadcasting would equate to significantly weakening this general interest objective with the loss of the national media industry and no production of local works and hence jobs.

The Wider Spectrum Group calls for European Policy makers to stay the course initiated by EU's strong stance in defense of its Creative and Cultural Industries at WRC15 and build on the long term visibility afforded by the 2017 EU Decision 2017/899 [10], so as to bring about an industrial policy that will:

- 1. Position creative and cultural industries at the heart of Europe's Digital Single Market objectives**
- 2. Guide new and sustain existing investments to increase certainty for employers, employees and the public alike as well as to maintain innovation, plurality and cultural diversity**
- 3. Take decisions on critical resources such as spectrum allocation regarding the use of the UHF band on the basis of a comprehensive examination of the impact on cultural and creative sector growth and jobs, particularly in the context of the upcoming World Radio Conferences, of the European Electronic Communications' Code or any revision of the Radio Spectrum Policy Program [17].**

It is urgent to adopt a wider vision, an industrial strategy, and stay the course for Europe

References

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12. Pascal Lamy, Report to the European Commission, [Results of the work of the high level group on the future use of the UHF band \(470-790 MHz\)](#), September 2014
13. See also RSPG opinion [on long term use of UHF band](#) (February 2015), [ECC report 224](#) on the Long Term Vision for the UHF broadcasting band (November 2014) and the RSPG Opinion on a [long-term strategy on future spectrum needs and use of wireless audio and video PMSE applications](#). (November 2017)
14. Conclusions of the study Challenges and opportunities of broadcast-broadband convergence and its impact on spectrum and network use, by Plum and Francombe for the European Commission, 2014
15. CEPT harmonized band plan identifies Supplemental Down Link spectrum at 1500 MHz and 700 MHz, which is suitable for LTE broadcast
16. [Electronic Communications Framework Directive](#), 2009/140/EC, 2009
17. The Radio Spectrum Policy Program (RSPP) defines common policies within the European Union
18. According to the comparison table page 70 in [RSPG Opinion on the implementation of the current RSPP and its revision to address the next period](#), February 2016

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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 European and national policies regarding frequency allocation preserves 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 German private radios and tele-media enterprises)

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