

## **WIDER SPECTRUM GROUP RESPONSE TO RSPG PUBLIC CONSULTATION On Assessment of future usage of the frequency band 470-694 MHz within the EU**

Having answered RSPG questionnaire and attended the stakeholders' workshop, the [Wider Spectrum Group](#) (1) appreciates the RSPG working group's method and efforts. We welcome the opportunity to comment on the Draft Report gathering the findings and the views of administrations. We have three proposals for short added text.

### **I) Comment on the social, economic and cultural impact of the band 470-694 MHz in Europe**

Spectrum policy strongly impacts the creative and content industry (through terrestrial broadcasting and PMSE) from creation to distribution to consumers.

TV and radio each reach 80% of consumers weekly in Europe, who benefit from free to air services, while PMSE enables content creation and delivery enjoyed by everyone. The ecosystem represented by the Wider Spectrum Group (Film, TV, radio, news media, music, and performing arts) accounts for €100 b value added yearly and 2.5 M jobs in Europe<sup>1</sup>.

We therefore fully concur with the sentence in page 20 (last before the conclusion) *“Decisions made in the coming years will determine not only the use of the 470–694 MHz band but also how Europe aligns its digital leadership ambitions with its longstanding commitments to public service and cultural resilience.”*

Considering article 7 of the UHF [Decision \(EU\) 2017/899](#) *“The Commission shall take into account the social, economic, cultural and international aspects affecting the use of the sub-700 MHz frequency band...”* this key sentence should in our view be included in the Executive summary.

#### **-> Proposal #1:**

Duplicate the sentence “Decisions...cultural resilience” (page 20) in the Executive Summary just before the last paragraph (page 4) which starts with “The 2023 Opinion...”.

### **II) Social partners are also interested parties**

Trade unions and employer organizations (UNI-MEI, EFJ, and PEARLE\*) through the Wider Spectrum Group response have emphasized in answer to Question 81 the importance of the 470-694 MHz band for the employment in the broadcasting, media news and live performance sectors. This category of interested parties is currently not reflected in the draft report, despite being part of [the response of the Wider Spectrum Group to the questionnaire](#) and part of [our statement](#) distributed at the stakeholders' workshop.

#### **-> Proposal #2**

In Annex I 5) page 85 add a short sub section f after e- retailers and installers

**“f- Trade unions and employer organizations.**

**Social partners representing the Media, Entertainment and Arts, Live Performance sector and Journalists emphasize that the European Audiovisual model ensures millions of qualified and local jobs in the Audiovisual sector, radio, live performance, also pointing to fall out on advertising, music and film production. “**

### **III) Democracy and Employment are important dimensions to be highlighted in the Report**

The word “democracy” appears at 3 instances in the Annex, but not in the main text, while the words “jobs” or “employment” are missing. Both dimensions are legitimate to be addressed by RSPG based on responses received and in view of [article 7 of the UHF Decision](#) and the [EU Declaration on Digital Rights and Principles](#) (especially chapters II and IV)

#### **-> Proposal #3**

Add the sentence in bold to main text page 17 first paragraph of 5) “The respondents’ open-ended comments support the continuation and long-term viability of DTTB beyond 2030, highlighting its critical role as a public service, its resilience and its importance to various user groups, particularly vulnerable households. **The positive impacts on employment and democracy are also highlighted.**”

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(1) Established in 2015, the Wider Spectrum Group at [www.widerspectrum.org](http://www.widerspectrum.org) gathers European and national organisations around the societal and economic stakes of spectrum allocation for the content and cultural industry:

- European Content: the European Broadcasting Union ([EBU](#)), the Association of European Radios ([AER](#)), the European Audiovisual Production association ([CEPI](#)), the UK free TV platforms [Everyone TV](#) , the umbrella association for German Film Industry ([SPIO](#)) ,the Spanish association of the private owned nationwide free-DTT broadcasters ([UTECA](#)), the German association of private media ([VAUNET](#))
- Networks: Broadcast Networks Europe ([BNE](#)); in addition, some of the TV and radio broadcasters above operate their own terrestrial broadcasting facilities
- PMSE: the Association of Professional Wireless Technologies ([APWPT](#)) ; live performance Europe [Pearle\\*](#); Save Our Spectrum ([SOS](#))
- Trade unions, viewers, listeners and consumers : The European Region of the Media, Entertainment & Arts sector of Union Global Union ([UNI-MEI](#)); European federation of Journalists ([EFJ](#)) ;The European Alliance of Listeners’ and Viewers’ Associations ([EURALVA](#)) ;the Spanish Association of Users Communication ([AUC](#)); the Spanish Federation of Associations for the Quality of the Media ([ICMedia](#)); the Spanish coalition TDT [Television Abierta](#) ;the UK Voice of the Listener and the Viewer ([VLV](#))

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<sup>1</sup> Facts and figures with detailed sources are available in the [Resource section](#) of our website.