

The Wider Spectrum Group asks the Council to preserve the current UHF Band allocation by defending No Change at WRC-23

5 June 2023

While recognizing the value of considering a secondary mobile allocation¹ 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 Council to support “No Change” and oppose a co-primary allocation to mobile in the international debate on 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 that would not prejudice any specific regulatory action.

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 effects 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, e.g. concerts, and much less content creation and associated jobs.

For that reason, the Wider Spectrum Group has called for a firm EU position in favour of "No Change" in the allocation of the UHF band at WRC-23. This position is echoed by more than 100 organizations that joined the Call to Europe in May 2023.

As the Council is now preparing the EU position ahead of WRC-23, after the Opinion of the RSPG and the proposal from the Commission for a Council Decision on WRC-23, we respectfully ask that the following 4 points are duly considered:

1. The Council position must be compliant with EU law, in particular with 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. The first part of that Decision has been delivered by making the 700 MHz band available for mobile broadband. It is only fair and respectful of the letter and intent of the law that the second part, i.e. guaranteed long-term access to the 470-694 MHz band for broadcasting and PMSE, is now enforced.
2. In that respect, the Council Decision should support No Change to the ITU Radio Regulations on Agenda item 1.5, which allows a peaceful continuation of the allocation chosen in Europe. The Council should oppose proposals for co-primary allocation to mobile at WRC-23, effective now or later, which would dramatically upset the balance reached in Europe.
3. To respect the period of regulatory certainty until at least 2030, the Council Decision should also exclude any new discussion before WRC-31. For the same reason, and to avoid an unbalanced entry point in future negotiations, the wording for an agenda item at WRC-31 or later should be as neutral as possible, like the one adopted at WRC-15 for WRC-23.
4. Finally, the possible 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. While the Wider Spectrum Group respects that this could be a compromise way forward **at WRC-23** to accommodate the national needs of some countries, it is crucial that the WRC-23 Council Decision is strong in preserving the current use of the 470-694 MHz band.

¹ As stated in the compromise proposal by RSPG relative to agenda item 1.5

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 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

