

Yleisradio Oy, the public service broadcasting company in Finland, hereby presents its comments.

Yleisradio supports the separate statement on the issue given by EBU, the European Broadcasting Union. In addition, the company wishes to comment as follows:

In connection with the update of the Regulatory Framework for Electronic Communications Networks and Services the entire EU spectrum policy is being renewed. The draft RSPG opinion does not comment on the direction of the renewal but instead is concerned with the present situation. Taking into account the perspective of the draft report (year 2015), the proposals and changes in the future EU spectrum policy now presented are, in the opinion of Yleisradio, so significant that it would be necessary, already at this stage, to present, if only provisionally, the foreseeable changes of the spectrum policy and to comment on them.

Yleisradio wishes to bring to attention the fast development of television operations as mobile reception of television programmes arises and spreads. In addition, there is a strong interest in providing more digital television channels. In Finland, when applications have been invited for operating licences, there have been clearly more applicants than there has been capacity on offer. In assessing future spectrum requirements, the technological development to HDTV level must be taken into account. Radio operations, too, face the digitalisation of the entire distribution technology.

For the above reason one should reject that frequencies currently used or frequencies now allocated for television and radio operations be reduced.

In television operations, in particular, transmission technology is changing fast as it becomes even more efficient. Nevertheless the whole capacity is needed for traditional and new television and radio services including HDTV and mobile television. In analysing the efficiency aspect the draft report refers to the coding technology MPEG-4 and transmission technology DVB-T2. The introduction of this type of technologies may double the present capacity for digital radio and television and provide a cost-effective means of also terrestrial distribution of television channels of HDTV standard.

In addition, some features in the development of reception technology may make it easier for viewers to move to more advanced technologies. This would mean faster development of the markets both in transmission operations and in reception devices.

The rapid development in transmission technology, however, emphasises the point of view that, in order to promote new innovations and to create a leading position in technology, the entry into the markets has to be timed right. From this point of view, it may be necessary to seriously consider the introduction, where applicable, of new (fixed reception) multiplexes for terrestrial television operations only when new technologies are available after 2010. Close follow-up of technical development is

necessary.

When considering the future use of the spectrum currently used or now allocated for television and radio operations, interference and its significance for efficient use of the spectrum also have to be taken into account. In this respect Yleisradio strongly supports the opinions presented by RSPG on the necessity of research concerning this issue.

Attention must also be paid to the consumers' low tolerance of interference in digital television due to its technical character, different from analogue television in this respect, and due to the fact that digital television has been marketed to the viewers as high-quality television, technically free from interference. For this reason, a most critical view must be taken concerning the possibility of allowing other operations on to the spectrum used by digital television operations.