

Results of Public Consultation on RSPG Work Programme 2011

Introduction

The draft RSPG Work Programme was issued for public consultation in October 2010 as RSPG10-346-Draft Rev 2. By the deadline of 15 January 2011 a total of 5 responses were received from AER, ARD/ZDF, EBU, Telecom Italia and Telefonica Group.

All of the responses were supportive of the proposed work programme, and following a review of the comments it is not proposed that any significant changes are required to the work programme. However, there were a number of very pertinent and valid points made by respondents, as summarised below, which should be taken into account by the respective working groups, once established, with responsibility for the individual work items. The working groups will be advised to review the relevant responses in detail in the course of their work and this point will also be noted in the forthcoming Chairman's report.

Summary of Responses to Public Consultation

The following is a brief summary of key points raised by the respondents to the public consultation. The list of points is not exhaustive and RSPG working groups in particular are referred to the original documents for more detail.

i) AER (Association Européenne des Radios)

AER made a number of points from the perspective of commercially-funded radio broadcasting. Two points in particular were that:

- access to bands II, III and L should be preserved for radio broadcasting; and,
- exceptions to market-based approaches to spectrum management in the bands mentioned above should be maintained.

ii) ARD/ZDF

ARD/ZDF proposed that socio-economic issues should be taken into account in the review of spectrum. This point was reiterated in the context of the joint RSPG-BEREC work item. They also expressed concern that the capacity and development needs of the TV broadcasting community are underestimated when looking at broadband requirements.

In the context of subjects for review and development ARD/ZDF proposed that the RSPG should consider measures for PMSE such as investigating technological improvements, identification of alternative spectrum and prevention of harmful interference to PMSE.

iii) EBU (European Broadcasting Union)

Regarding the review of spectrum use the EBU proposed that, besides market and technology trends, the review should also take into account social and cultural aspects of spectrum use. They also supported the proposed subjects for review and development during 2011, specifically interference management and digital radio broadcasting.

iv) Telecom Italia

Telecom Italia was very supportive of the work programme and made many detailed comments on each work item. No changes as such were proposed to the work programme but, again, working groups should review Telecom Italia's comments in detail to inform their approach to each task.

v) Telefónica Group

Telefónica proposed that the RSPG should hold public consultations on all of its deliverables. On the spectrum review Telefónica identified a number of trends in technology and proposed that the scope of the spectrum review should encompass a greater spectrum range than 300 MHz to 3 GHz and it should look ahead to 2020 in terms of identifying spectrum needs.

On collective use of spectrum they do not expect any further increase in the amount of spectrum set aside for licence exempt use in the short to medium term in frequencies below about 60GHz, and said that it should be made clear which 'white space' spectrum should be the focus of the work item.

Telefónica commented on the broadband coverage item that, *"We are particularly concerned, therefore, about the use of undefined measures of competition in the RSPP, as this may be seen as decreasing legal certainty and consequently discouraging investment, and consider that the RSPG's further work on the RSPP, and on broadband coverage in particular, should result in the removal of ambiguity and the increase of legal certainty in the final wording."*

Changes to Work Items in the RSPG Work Programme

The following changes (including correction of typographical errors) are proposed to the draft work programme. These are shown as tracked changes in document **RSPG11-346**.

Section	Change	Reason
Introduction, para 4, 1 st sentence	Remove square brackets	No longer required in final version
1) Review of spectrum use	Remove underlining to text: "demand and the impact of technology trends on such demand". Add 'Yes' to Public Consultation and November 2011 as target date	No longer required in final version Draft Opinions are subject to public consultation and November is proposed as a realistic timeframe.
2) Collective Use of Spectrum	Add 'No' to Public Consultation and 'June 2011 Plenary (subject to review)' as target date	Reports are not generally subject to consultation. The comment 'subject to review' reflects possibility that the EC may come forward with a specific proposal later in the year.

Section	Change	Reason
<p>3) Improving broadband coverage</p> <p>Work outline, item ii)</p>	<p>Add 'Yes' to Public Consultation and November 2011 as target date</p> <p>Delete semicolon so that text reads, "...for broadband applications ..."</p>	<p>Draft Opinions are subject to public consultation and November is proposed as a realistic timeframe.</p> <p>Typographical error</p>
<p>4) Economic & social value of spectrum and joint RSPG-BEREC work</p>	<p>Note change of title and consequent insertion of 'and social' in the work outline.</p> <p>Add 'No' to Public Consultation and November 2011 as target date</p>	<p>To better reflect need to take account of social value of spectrum in addition to the economic value.</p> <p>Reports are not generally subject to consultation.</p>
<p>5) International coordination of spectrum</p>	<p>Amend work outline item i) to read, "Monitor and, where necessary, report on any additional elements relating to WRC-12 not already covered by the [existing] RSPG Opinion (RSPG10-350)* on WRC-12."</p> <p>For item i) Add 'Report' and 'No' to Public Consultation; For item ii) Add 'Opinion' and 'Yes' to Public Consultation; and November 2011 as target date for both items.</p>	<p>The original proposal for an Opinion in item i) has already been covered by the RSPG Report on Frequency Coordination and Other Issues Concerning the Digital Dividend (RSPG10-347) which included a process to assist member states in their efforts to coordinate frequencies with non-EU countries.</p> <p>The square brackets in item i) can be removed when RSPG10-350 is finally adopted.</p>