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**Confindustria Radio Televisioni response to the
 Public consultation on “BEREC Report on practices and challenges of the
 phasing out of 2G and 3G”**

Confindustria Radio Televisioni (CRTV) is the association of Italian public and commercial radio and television broadcasters.

Established in June 2013, CRTV includes among its members: Discovery Italia, Elemedia (GEDI), GMH, La7, Mediaset, Persidera, Prima Tv, Qvc Italia, Radio Italia, CN Media, RAI Radiotelevisione Italiana, Gruppo 24Ore, RDS – Radio Dimensione Suono, Rete Blu, RTL 102,500 Hit Radio, Sportcast, Tivù, Viacom International Media Network Italia, EI Towers. Satellite operator Eutelsat Italy is an aggregated member. Major local TV and radio broadcasters are represented in CRTV through the Association of Local Televisions and the Association of Local Radios FRT.

The sector has overall revenue of about 9,8 billion euros and a workforce of approximately 90,000 employees, of which about 30,000 direct (CRTV estimates).

CRTV’s goal is to represent the broadcasting industry as a whole at the institutional, legislative and contractual levels.

BROADCASTER TV:

Discovery Italia Srl
 Gmh Spa
 La7 Spa
 Mediaset Spa
 Qvc Spa
 Rai Spa
 Rete Blu Spa
 Sportcast Srl
 Viacom International
 Media Network Italia Srl

RADIO NAZIONALI:

Cn Media Srl
 Elemedia Spa
 Gruppo Sole24 ore
 Radio Dimensione
 Suono Spa
 RadioMediaset Spa
 Radio Italia Spa
 Rai Spa
 RTL 102,500 Hit Radio Srl

EMITTENZA LOCALE:

Associazione Tv
 Locali
 Associazione Radio
 FRT

PIATTAFORME

SATELLITARI:
 Eutelsat SA
 Tivu Srl

OPERATORI DI

RETE:
 Ei Towers Spa
 Elettronica
 Industriale Spa
 Persidera Spa
 Prima Tv Spa
 Rai Way Spa

PARTECIPAZIONI IN:

Confindustria
 Auditel
 IAP
 AER
 Eurovisioni
 Osservatorio TuttiMedia
 ITU - International
 Telecommunication
 Union

CRTV collaborates with all competent Ministries, Political Institutions, and Regulators, both at national and EU level. The Association's activities are aimed at contributing to the creation and maintenance of fair rules that allow the sector to grow, innovate and continue to play its important role in the modernization process of the country.

Consultation issues

- Which other potential challenges/impacts would you identify?
- How urgently do you think the different challenges/impacts need to be addressed (time, priority)?
- What challenges / impacts have already been solved or can be considered minor?
- What stakeholders should initiate (more) efforts to meet the challenges/impacts?
- What stakeholders should be involved in efforts to meet the challenges/impacts? How should they contribute?

Efficient use of spectrum for the benefit of all and phasing out obsolete technologies

It is essential to pursue technology neutrality for all services to guarantee the most efficient use of the radioelectric spectrum. At the same time the regulatory framework should help new technologies evolution setting the phasing out of older ones which do not use any more the spectrum in an efficient manner.

The request of additional frequency for mobile services - with specific reference to frequencies below 1 GHz - would be illogical if the spectrum already assigned is used in an inefficient manner.

It would therefore be of utmost importance for all member states to adopt a migration plan for the phasing out of 2G and 3G technologies for the benefit of an efficient use of frequencies.

The requirements of the mobile sector are changing. The mobile sector is requiring large contiguous blocks of spectrum and there will be limited demand for further assignments of 2x5 or 2x10 MHz as previously happened for 800 and 700 band. Therefore, the real need of the mobile sector for frequencies below 1 GHz is not a new allocation, but a better use of existing allocated frequencies.

Moreover the mobile sector's storytelling refers to sub-700 MHz band for connectivity "*covering also sparsely populated areas and reaching "deep-indoor"*"¹. This was the same claim used for 700 MHz and 800 MHz band allocation to IMT applications. 700 MHz and 800 MHz bands are more than sufficient to cover these needs, also without any new allocation.

To these conclusions the result of the White paper on behalf of Digital UK² that proposes to create a "*defragmentation dividend*" by reconfiguring 694-960 MHz band to make additional capacity available to mobile services and applications.

Emergency Calls and obsolete technologies

It is essential to move on a technology neutrality approach also for Emergency Calls and eCalls.

Adopting outdated mandatory technology for eCall services now makes it extremely difficult to move away from the old technologies as far as an emergency service is concerned.

The question is: why a new service such as eCalls was introduced on production cars starting from 2018 based on obsolete technology.

The only solution – at the state - is to reserve for an adequate timeframe a small portion of the 2G band for eCall emergency services only. No other services should remain on 2G-3G networks after a certain date to be defined at EU level.

¹ "Spectrum, inclusion and sustainability: why WRC-23 matters" - By Xhoana SHEHU, Policy Manager, ETNO – July 2023

² White paper on behalf of Digital UK - November 2017 AETHA "The defragmentation dividend - A more efficient use of the UHF band".