

The Swedish Radio and TV Authority's response to the European Commission's Public Consultation Document "Transforming the digital dividend opportunity into social benefits and economic growth in Europe" of 10 July 2009

Summary

The Swedish Radio and TV Authority welcomes the opportunity to contribute to the European Commission's public consultation concerning the Digital Dividend policy actions. In general, the Swedish Radio and TV Authority supports the Commission's initiative to coordinate and accelerate the European transition to digital terrestrial television. For Sweden, as a small market, it can be beneficial to give the receiver manufacturers predictable instructions regarding which standards that will be applied on a common European market and thereby achieving large-scale advantages such as lower consumer costs. However, the Swedish Radio and TV Authority would like to point at the importance of using the radio spectrum to guarantee the widest possible freedom of expression and freedom of information, rather than optimizing the economic growth.

An introduction to the Swedish Radio and TV Authority

The Swedish Radio and TV Authority is a national authority in the media sector, reporting to the Ministry of Culture in Sweden. Among other assignments, the Swedish Radio and TV Authority grants licences for terrestrial television as well as for local and community radio broadcasting. The Authority also monitors the development in the media field and issues regulations on television standards and exercises a supervisory role in this area.

The widest possible freedom of expression and freedom of information

When deciding how to divide and utilise available radio spectrum in Sweden, the public institutions shall seek to ensure that radio frequencies are utilised in such a way as to result in the widest possible freedom of expression and freedom of information (Chapter 3, Section 2, second paragraph of the Fundamental Law on Freedom of Expression 1991:1469). When applying the Swedish Electronic Communications Act, particular regard shall be taken to the importance of electronic communications for the freedom of expression and freedom of information (Chapter 1, Section 1, third paragraph of the Electronic Communication Act 2003:389). When discussing if available spectrum should be used for other purposes than television broadcasts, it is therefore of greatest importance to ensure that the spectrum is utilised resulting in the widest possible freedom of expression and freedom of information.

The spectrum for television transmissions in Sweden

Sweden was one of the first countries to complete the transition to digital terrestrial television, switching off the last analogue broadcasts in October 2007. On 19 December

2007, the Swedish Government decided how the available (analogue) spectrum should be utilised until 31 March 2014. The decision states that the radio spectrum between 470 and 790 MHz and between 174 and 230 MHz may be used for television broadcasts. The released spectrum between 790 and 862 MHz may be used for other services than television transmissions and that spectrum is allocated by the Swedish Post and Telecom Agency (PTS) in accordance with the Electronic Communication Act. This spectrum (the 800 MHz band) has not yet been allocated. PTS is planning an auction next autumn, 2010.

The Swedish licensing process and the Commission's proposal regarding the transition to MPEG-4

On 27 March 2008, the Swedish Radio and TV Authority granted licences to broadcast terrestrial television, 40 licences with national coverage and 14 local and regional licences. The licenses are valid between 1 April 2008 and 31 March 2014. For the time being, terrestrial television is broadcasted on five frequency channels in the spectrum between 470 and 790 MHz. A sixth frequency channel is under construction. The present transmissions are coded in MPEG-2. The licenses for broadcasters whose services will use the sixth frequency channel contain terms that stipulate the use of MPEG-4 when broadcasting is initiated. For other broadcasters, the licence terms stipulate that they should aim at switching over to MPEG-4 during the licence period. One part of the Swedish Radio and TV Authority's strategy regarding the licensing process is a gradual transition to MPEG-4 during the licence period. On the Swedish market, you find receivers compatible with both the MPEG-2 and MPEG-4 formats.

The Commission's proposal to set a last date for marketing non-compatible MPEG-4 receivers is in line with the strategy of the Swedish Radio and TV Authority, since this decision can stimulate broadcasters, operators and manufacturers to arrange for consumers to be able to buy such receivers at lower costs.

Enough radio spectrum is a precondition for further development in terrestrial television

At present, there are seven frequency channels available for terrestrial television broadcasts in Sweden. If these are all fully utilised this is equivalent to maximum 70 TV channels broadcasted in standard definition and coded in MPEG-4. This could be perceived as a relatively large amount of spectrum, offering the opportunity to broadcast many services. However, there is a rapid development in high definition television (HDTV). The problem with such high quality broadcasting as HDTV is that it demands significantly more transmission capacity. Using MPEG-4 compression in one frequency channel occupies up to three HDTV channels compared to 10 TV channels in standard definition.

Including a complete transition to MPEG-4 and a longer-term of implementing broadcasts using DVB-T2, the allocated spectrum will be needed for terrestrial television broadcasts. The Swedish Radio and TV Authority agrees that there are ways to rationalize the present spectrum usage below 790 MHz. However, this should not be done with the purpose to release more spectrum for other services than television. Instead, the rationalization should aim at guaranteeing terrestrial television broadcasts as a distribution platform offering high quality television and thereby enabling the execution of Swedish media policy aims. This is also a precondition for reaching the

Commission's objective to meet consumers' expectations including high definition quality in terrestrial TV transmissions (Section 4.1 of the Commission's Consultation).

Miscellaneous

Considering these matters from a more technical perspective, the Swedish Radio and TV Authority would like to call attention to a further aspect. Today, many television receivers on the market receive transmissions on frequencies up to 862 MHz. If other services than television are transmitted in the spectrum between 790 and 862 MHz, there is a risk of interfering the receivers. PTS has commissioned a consultant investigation regarding this matter. The consultant report concludes that there is a risk for receiver interference and proposes some measures to minimize this risk. The Swedish Radio and TV Authority would like to underline the importance of European harmonization and standardization in order to avoid such problems.