

Ministry of Transport and Communications

PL 31

00023 Valtioneuvosto

Finland

BY REGISTERED POST AND EMAIL (kirjaamo@lvm.fi)

4 August 2015

Dear Sirs

Re: Case Number: LVM/2138/07/2014

We write further to your letter of 24 June 2015 addressed to Discovery Communications Europe Limited, Discovery Networks Finland Oy (formerly SBS Discovery TV Oy), and Eurosport SAS (together, “**Discovery**”) requesting an opinion on proposed changes in the DTT market in Finland.

Discovery remains committed to the Finnish DTT market and welcomes the opportunity to respond to this consultation and believes that a continued strong offering of content on the DTT platform is important to maintaining good competition in the Finnish market. For this reason a clear path should be set which causes the least disruption possible both to viewers of DTT services and to the broadcasters who provide those services. Discovery is happy and willing to take part in any further working groups to ensure that any changes to the infrastructure or delivery should be carefully examined, and carried out with care.

Discovery supports the proposed migration to DVB-T2 technology provided that such migration is implemented on a flexible basis for broadcasters and operators alike, i.e. broadcasters and operators will retain the ability to decide together when such changes are implemented. The reason for this is that many consumers do not have access to the hardware required for delivery via this technology. Consumers will therefore have to pay for new televisions or new receiver boxes in order to utilise the services of the DTT network.

Consideration should therefore be given to the period of time that will be required for a natural transition of the majority of viewers to DVB-T2 technology. Any plan proposing a transition in too short a timeframe could undermine consumer confidence in the DTT network and harm uptake of DTT in the future. Discovery wants to ensure that the same variety and number of channels will continue to be available to viewers.

Discovery therefore proposes the following actions to mitigate against any potential problems that may be caused by the change:

- A gradual transition to DVB-T2 technology over a period of time should be implemented, and operators and broadcasters should retain flexibility as to when they wish to make these changes.

- During this transitional period, broadcasts in both HD and SD on the current DTT frequency should be maintained.
- If necessary, funding from the sale of spectrum capacity should be provided to ease the transition.
- Any spectrum plan should maintain the current number of channels at their current prices. There should be no reduction of capacity or increase in cost for access to it.
- Any benefit made from the auction of the relevant spectrum could be used to help consumers transition to the new technology necessary to access DTT post switchover.

Yours faithfully



For and on behalf of

**DISCOVERY COMMUNICATIONS EUROPE LIMITED, DISCOVERY NETWORKS
FINLAND OY AND EUROSPORT SAS**