

Ministry of Transport and Communications  
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2nd July 2012

**Communications Policy Programme for Electronic Media**

Dear Sirs,

FOX International Channels (FIC) welcomes the opportunity to comment on the above-mentioned consultation.

After taking the opportunity to review the draft Communications Policy Programme in detail, FIC would like to address the following issues related to the Programme. Being solely a TV-broadcasting company, FIC will limit its comments to television broadcasting only.

The proposed Programme contains many elements which FIC believes will positively impact the development of the Finnish TV-market, including:

- The Programme's goal to increase and strengthen the quality and diversity of TV programming in Finland.

In FIC's view, this is especially important for the public service channels, which will continue to be the most viewed Finnish channels for the foreseeable future. FIC believes that the diversity of TV programming should be evaluated broadly to include specific programme content and the amount of independent production featured, but also the diversity of voices within the public service channels, so that a few players cannot unduly influence programming and the content available to Finnish viewers.

- The proposal to maintain DVB-T broadcasts on two multiplexes until at least 2026.

Maintaining the current DVB-T technology until at least 2026 will insure that the public service channels continue to be widely available to Finnish viewers and that digital terrestrial television will continue to be one of the leading television broadcast technologies in Finland.

However, FIC believes the Programme's proposal to move all other multiplexes to DVBT-2 technology could limit the availability of all non-public service TV channels to Finnish viewers depending on the pace of DVB-T2 adoption. This would negatively affect both the Finnish public and broadcasters and service providers utilizing these multiplexes. Promoting DVB-T2 adoption between 2012 and 2017 is

therefore crucial to insuring the availability of these channels to the Finnish public and to maintaining the economic viability of operating these multiplexes and these channels after the new policy has taken effect.

FIC would like to stress what it sees as the importance of the Government's role in supporting and driving DVB-T2 adoption by means of effective communication and possibly economic incentives. Without widespread adoption of DVB-T2 technology before the proposed switchover, FIC foresees the possibility for Finnish viewers and TV broadcasters and operators to be substantially negatively impacted and for DTT to lose relevance and its position as a leading broadcast technology in Finland.

FIC understands that the current proposed Programme establishes a framework for the new Communications Policy. As this process proceeds and the Policy is finalized, FIC believes it is important to address a number of important questions. These questions and FIC's views on them are as follows:

## DVB-T2 uptake

How will the government help promote consumer adoption of DVBT-2 technology prior to 2017?

*As mentioned above, FIC would encourage the Government to take an active role in promoting DVB-T2 uptake through communication to the public, economic incentives for consumers and reimbursement of current network capacity and supervision fees as well as planned spectrum fees for DVB-T2 licence holders.*

## Broadcasting licences

The Program stipulates that the Government or the Finnish Communications Regulatory Authority (FICORA) will determine the public service channels as well as the channels eligible for a broadcasting licence going forward.

- What will the criteria be for determining the public service channels?
- What will the timing and process be to determine the public service channels?

*FIC is supportive of the proposed use of the comparative method to determine the public service channels, but would like to emphasize that the process and criteria should be fully transparent. FIC would also reiterate its belief that the Finnish public will be best served by a range of public service channels representing diverse corporate voices.*

## Spectrum fee

Currently licence holders are charged an annual supervision fee for nation-wide and regional licenses. The new Programme suggests the non-public service channels (channels outside the principal commercial multiplexes) would have to pay a higher spectrum fee.

- Would the current supervision fee cease to exist?
- What would the spectrum fee be and how will it be determined?

*The proposed Programme states that the new fee will be moderate. FIC would emphasize that the fee should not discourage competition or stifle diversity, nor should it inhibit the transition to DVBT-2.*

FIC appreciates the opportunity to comment on the draft Communications Policy Programme for Electronic Media.