

Kulturdepartementet  
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Oslo, 19.8.2013

**HØRINGSUTTALELSE til EU - kommisjonens grønnbok:  
"Preparing for a Fully Converged Audiovisual World: Growth, Creation and Values".**

Vi viser til høringsbrev fra Kulturdepartementet av 3. juli 2013, og som høringsinstans ønsker Norges televisjon å fremlegge sine synspunkter rundt spørsmål 7, 8 og 9 i kapittel 2.4. Norges televisjon har valgt å svare på spørsmålene på engelsk.

**Question 7:**

How relevant are differences between individual platforms delivering content (e.g. terrestrial and satellite broadcasting, wired broadband including cable, mobile broadband) in terms of consumer experience and of public interest obligations?

**Norges televisjon response:**

The differences between the individual platforms are relevant with regards to securing the competition in the market place as well as availability for TV-signals for the whole population in Norway. In addition to this, DTT is a cost-efficient solution for distributing TV content to many users.

**Competetion:**

In Norway there are 3 major payTV platforms: satellite and cable / fiber and DTT. The DTT-platform is important for the competition in the payTV market – hereunder product development, packaging and pricing of content. As media-distribution is such an important facility in every modern society, it is important to avoid concentration of market power in this area of business. The likelihood of market concentration is less with 3 providers of payTV services, than 2. Some of the same players in the industry are also planning to launch LTE-services.

**Availability:**

The DTT network covers approximately 98% of all households and approximately 80% of all leisure houses / cabins in Norway. In addition the DTT-platform is the only platform that offers access to NRK (the public broadcaster) free of charge.

Approximately 10-15% of all households in Norway are located in areas where it is not possible to receive signals from satellites due to topographical circumstances. The very same areas have in many cases limited access to cable / fiber. The terrestrial platform is an important distribution network for this part of the population and covers most of these households. In addition to the DTT-network, to secure that all households get access to NRK's services, it is built a so called "satellite-shadow-network", i.e. areas where signal from satellites cannot be received from satellite or cable / fiber. This satellite-shadow-network" consists of 550 transmitters and enables 0,25% of the population to receive NRK.

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**Question 8:**

What frequency allocation and sharing models can facilitate development opportunities for broadcasting, mobile broadband and other applications (such as programme-making equipment) carried in the same frequency bands?

**Norges televisjon response:**

Norges televisjon has already done some preliminary research work and is currently participating in some research studies addressing those issues. It is too early to state any points of views in this context.

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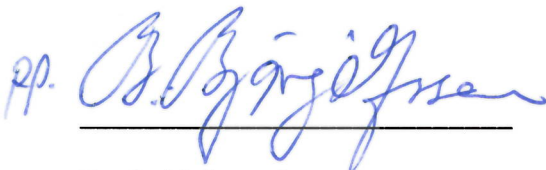
**Question 9:**

What specific research needs with regard to spectrum have to be addressed to facilitate such development?

**Norges televisjon response:**

Norges televisjon has already done some preliminary research work and is currently participating in some research studies addressing those issues. It is too early to state any points of views in this context.

Med vennlig hilsen  
for Norges televisjon AS (NTV)



Trude Malterud

Adm. dir.