

# Royal Decree approving the National Technical Plan for Digital Terrestrial Television and regulating certain measures to promote the technological evolution of digital terrestrial television

Contribution of AMETIC to TRIS – European Commission Notification [Notification Detail | TRIS - European Commission](#)

## Introduction

[AMETIC](#) is the Association representing Spain's digital industry, encompassing a wide range of organizations, from SMEs to global corporations in sectors like IT, telecommunications, consumer electronics, and digital services.

AMETIC's mission is to promote the growth of a competitive, sustainable, and innovative digital industry in Spain, focusing on digital transformation and talent development.

With over 50 years of experience, it works with public administrations and supports the internationalization of Spanish companies, contributing to sustainable economic growth and job creation.

## Comments from TV Manufacturers to draft Royal Decree notified to EC

TV Manufacturers represented by AMETIC already contributed to the Public Consultation that was opened by Spanish authorities, together with other companies that are engaged with AMETIC's "TDT and DAB+" Working Group. This Public Consultation was based on the draft Royal Decree that was published on 25<sup>th</sup> September 2024 and was closed on 17<sup>th</sup> October.

Just before closing the Public Consultation, on 15<sup>th</sup> October 2024, another draft Royal Decree text was notified to European Commission in the TRIS portal. After comparing the draft text notified to EC with the previous text published in the Spanish Public Consultation, AMETIC identified one change that impacts the requirements potentially imposed to TV Manufacturers.

This change is found in 4<sup>th</sup> point of the Sixth transition provision:

*"4. As regards interactive services, digital terrestrial television receivers with a viewable screen area equal to or greater than 61 centimetres (24 inches), which are placed on the Spanish market after nine months from the entry into force of this Royal Decree, must have a broadband connection and be compatible with the European standard [ETSI TS 102 796] v1.4.1 (or later) Hybrid Broadcast Broadband TV – HbbTV, implementing the specification HbbTV 2.0.4 or later."*

In the first version of the draft Royal Decree (used for Spanish Public Consultation), the required HbbTV specification version was different, as follows:

*“4. As regards interactive services, digital terrestrial television receivers ... must have a broadband connection and be compatible with the European standard [ETSI TS 102 796] v1.4.1 (or later) Hybrid Broadcast Broadband TV – HbbTV, implementing the specification HbbTV 2.0.1 or later.”*

From our point of view, mandating the support of the latest HbbTV specification in all TV products placed in the market is excessive and it is not justified. HbbTV 2.0.4 was published last year (March 2023), and the related European standard ETSI TS 102 796 v1.7.1 was published in September 2023. Although some TV products may start supporting this version in 2025, we expect it will take some years until this version could be considered a minimum requirement.

If HbbTV 2.0.4 is mandated as a legal requirement for Spain, it would require adaptation also for derivative models that are expected to be sold in the European Union in the coming years. This impact is not limited to the software design resources, but it also includes potential re-certification costs, as a significant part of the certified product is modified. The products are common to the EU countries, so upgrading HbbTV version due to Spanish regulation will be translated to re-certification costs in other European countries, with a huge cost for TV manufacturers.

From a features point of view, AMETIC understands that keeping the same HbbTV version (2.0.1) that was enforced in 2019 (RD 391/2019) may not be enough for the future adoption of UHD services with HDR. The necessary HDR and next generation audio support was specified in HbbTV 2.0.2, and later standardised in ETSI TS 102 796 v1.5.1. We consider that this version is more suitable to be considered as a minimum requirement, as it was published in 2020, and could be adopted with a reasonable impact.

However, our recommendation is that specific HbbTV versions should not be part of a legal document, such as this Royal Decree. Due to the continuous evolution of the standard, AMETIC considers that HbbTV specification should be referenced in a more technical guideline, where other technical aspects need to be clarified anyway (such as new signalling, DVB-T2 technical parameters, detailed parameters for UHD, HDR, NGA, etc).

## **Other comments from TV manufacturers already raised in Spanish Public Consultation**

Regardless of HbbTV version, that was unexpectedly changed from Spanish Public Consultation text to European Commission notified text, there are other concerning aspects that AMETIC already raised, and TV manufacturers represented in AMETIC want to highlight in this response to EC.

## Grace Period

TV Manufacturers represented by AMETIC highlight their concern about the enforcement period defined in this draft Royal Decree. As raised in the Public Consultation, we consider that 9 months is not enough time for TV manufacturers for the implementation and deployment of this requirement.

Considering other regulations, we understand that 12 months is the minimum enforcement time, although we consider that 18 months is more aligned to the actual timings of the TV industry.

The requirement to support UHD reception even in the entry segment (less than 40", with Full HD screens) already represents a huge challenge. Entry segment chipsets performance may not be enough to decode H-265 video codec and downscale from UHD to HD resolution, so we may expect an impact in entry segment costs.

## Supported Audio Codecs

When defining the technical specifications for UHD DTT broadcasts (in Article 10), it is mentioned that audio coding system shall meet international standard ITU-R BS.1196-7, and Section 6 'Audio' of European standard ETSI TS 101 154.

AMETIC has confidentially checked with each TV manufacturer which audio codecs are supported in the European market. After aggregating the data from each manufacturer, some of the audio codecs referenced in Section 6 'Audio' of ETSI TS 101 154 are not supported in the reception of DTT by most of the receivers placed in the European market.

In order to avoid serious interoperability issues (no sound), we suggest avoiding referencing the whole Section 6 'Audio' of ETSI TS 101 154 and limit the specification to the audio codecs that are widely supported in the European market.

## High Frame Rate

In the definition of the video characteristics of the UHD DTT broadcasting, it is mentioned that High Frame Rate (HFR) may be incorporated.

TV Manufacturers represented by AMETIC want to highlight that HFR is not supported and should not be used in Spain DTT. If HFR was potentially added to the UHD DTT broadcastings, the performance of the entry segment chipsets would not be capable to handle the signal.

## Proposed Amendments

Article / Section	Draft Decree Text	Proposed Text
Article 10 - c	The video signal may incorporate high dynamic range, expanded colour range, and high frame rate.	The video signal may incorporate high dynamic range, expanded colour range, and <b>high frame rate a frame refresh rate of 50Hz.</b>
Article 10 - d	The audio coding system shall meet international standard ITU-R BS.1196-7, and Section 6 'Audio' of European standard ETSI TS 101 154.	The audio coding system shall meet international standard ITU-R BS.1196-7, and Section 6 'Audio' of European standard ETSI TS 101 154. <b>It will be mandatory to include one audio codec that is supported by all TV receivers.</b>
Sixth transitional provision - 3	3. In addition to what is provided for in paragraph 1 of this article, digital terrestrial television receivers with a viewable screen area of less than 101.6 centimetres (40 inches), which are placed on the Spanish market after nine months from the entry into force of this Royal Decree, must incorporate a receiver and decoder suitable for ultra-high-definition broadcasts, with the technical specifications set out in Article 10.	3. In addition to what is provided for in paragraph 1 of this article, digital terrestrial television receivers with a viewable screen area of less than 101.6 centimetres (40 inches), which are placed on the Spanish market after <b>nine twelve</b> months from the entry into force of this Royal Decree, must incorporate a receiver and decoder suitable for ultra-high-definition broadcasts, with the technical specifications set out in Article 10.
Sixth transitional provision - 4	As regards interactive services, digital terrestrial television receivers with a viewable screen area equal to or greater than 61 centimetres (24 inches), which are placed on the Spanish market after nine months from the entry into force of this Royal Decree, must have a broadband connection and be compatible with the European standard [ETSI TS 102 796] v1.4.1 (or later) Hybrid Broadcast Broadband TV – HbbTV, implementing the specification HbbTV 2.0.4 or later.	As regards interactive services, digital terrestrial television receivers with a viewable screen area equal to or greater than 61 centimetres (24 inches), which are placed on the Spanish market after <b>nine twelve</b> months from the entry into force of this Royal Decree, must have a broadband connection and be compatible with the European standard [ETSI TS 102 796] v1. <b>5</b> .1 (or later) Hybrid Broadcast Broadband TV – HbbTV, implementing the specification HbbTV 2.0. <b>2</b> or later.

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Contact:

Eduardo Valencia  
[evalencia@ametic.es](mailto:evalencia@ametic.es)