

BNE¹ welcomes the RSPG initiative to open a public consultation on its Draft Opinion on WRC-27 and appreciates the opportunity to contribute to this important paper.

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Broadcast Networks Europe (BNE) welcomes the opportunity to contribute to the public consultation on the Draft RSPG Opinion on WRC-27 and will focus this contribution in particular on Section 4.18, concerning Resolution 235 (Rev. WRC-23) and Preliminary Agenda Item 2.14 relating to the future use of the 470–694 MHz band.

BNE represents the operators of Europe's terrestrial broadcasting networks, which provide universal access to audiovisual media services, support media pluralism and cultural diversity, and contribute to the resilience of Europe's communications ecosystem. Today, these networks are not only enabling traditional broadcasting services but are also evolving towards next-generation technologies such as DVB-T2, UHD and 5G Broadcast.

BNE welcomes the balanced approach adopted in the Draft Opinion, particularly the recognition that spectrum policy should reflect a wide range of European public policy objectives and not be assessed solely through the perspective of electronic communications and connectivity.

As a main comment, BNE would particularly emphasise that the RSPG Opinion and in general European spectrum policy should reaffirm long-term regulatory certainty and continued access to the 470–694 MHz band for terrestrial Broadcasting well beyond 2030, avoiding any premature reassessment of its future use until ongoing evidence-based studies, cost-benefit analysis and policy reviews have been completed.

As Europe prepares for WRC-27 and begins reflecting on the future use of the UHF band beyond 2030, it is essential that regulatory decisions remain evidence-based, technologically neutral and aligned with broader Union policy objectives, including audiovisual media policy, resilience, cultural diversity, strategic autonomy and European sovereignty.

BNE also notes that Resolution 235 (Rev. WRC-23) already reflects a carefully balanced outcome reached after extensive international negotiations and should be given sufficient time to be implemented, assessed and evaluated before any further regulatory reassessment of the 470–694 MHz band is considered.

¹ BNE represents Europe's terrestrial network operators in Europe and internationally. Terrestrial broadcast operators are responsible for managing and maintaining infrastructure, TV network design, multiplexing, distribution, transmission and carriage deliver so that TV, radio and other over-the-air services can reach their audiences.

BNE's 19 members are operating in 19 European countries: Austria, Belgium, Croatia, Czech Republic, Estonia, Finland, France, Germany, Greece, Ireland, Italy, the Netherlands, Poland, Romania, Serbia, Slovakia, Spain, UK and Sweden.

1. Recognition of audiovisual policy as a spectrum policy objective

BNE strongly welcomes the recognition of audiovisual media policy as a relevant EU policy area within the Draft Opinion.

This is an important development. Too often, debates on spectrum focus exclusively on connectivity metrics and mobile broadband demand, while overlooking the broader societal objectives that spectrum is intended to support.

The audiovisual sector contributes directly to several core EU objectives, including freedom of expression and information, media pluralism, cultural and linguistic diversity, universal access to trusted content and democratic participation. Terrestrial broadcasting remains one of the principal instruments through which these objectives are achieved.

Unlike subscription-based or individualised delivery models, terrestrial broadcasting guarantees universal access to audiovisual services irrespective of income, geography or broadband connectivity. It is also inherently resilient. Recent emergencies across Europe have demonstrated the value of maintaining communications platforms capable of reaching entire populations even when other networks experience power outages, congestion or service degradation.

For these reasons, BNE believes that the reference to audiovisual media policy should not remain merely descriptive. It should be fully reflected in the practical recommendations developed by the RSPG regarding the future use of the UHF band.

2. Innovation in terrestrial broadcasting

A recurring assumption in spectrum policy discussions is that broadcasting is a mature technology with limited future development potential. The reality is precisely the opposite.

Across Europe, broadcasters and network operators are investing significantly in the modernisation of terrestrial platforms through DVB-T2 deployment, UHD services and 5G Broadcast. These developments increase efficiency, improve service quality and reinforce the long-term value of the UHF band.

At a time when the broadcasting sector is making these investments and demonstrating innovation in practice, proposals continue to emerge that would further reduce the spectrum resources available to the sector. Such proposals risk undermining ongoing innovation precisely when new use cases are beginning to materialise.

This evolution is set out in BNE's Innovation Roadmap for the European Cultural Band, which frames the future of 470-694 MHz around three complementary vectors: enhanced user experience, seamless access to linear and on-demand content, and a native mobile experience. The Roadmap shows that DVB-T2/UHD and HbbTV are not isolated upgrades, but the first steps towards an all-IP, downlink-only ecosystem in which 5G Broadcast is a central enabler of mobility, public warning, resilience and efficient mass distribution.

a. Ultra High Definition (UHD)

One of the clearest examples of ongoing innovation is the transition towards UHD services.

The migration to DVB-T2 enables more efficient use of spectrum while supporting substantial improvements in picture quality and user experience. Broadcasting networks are increasingly being used to deliver UHD content to large audiences through a universally available platform.

The importance of this development extends beyond technical performance. It demonstrates that terrestrial broadcasting continues to evolve and remains capable of meeting changing consumer expectations.

UHD also highlights a fundamental characteristic of broadcasting: the ability to deliver premium content simultaneously to millions of users without increasing network load. This becomes particularly valuable during major live events, where point-to-point delivery models face increasing scalability challenges.

Examples from several European countries demonstrate that consumers respond positively when UHD services are made available through free-to-air platforms. Terrestrial broadcasting continues to act as an innovation platform capable of delivering high-quality audiovisual services efficiently and at scale.

b. 5G Broadcast

5G Broadcast should be treated as the strategic innovation priority for the future of the UHF band for Europe.

It is a standardised 3GPP technology that brings the efficiency of one-to-many broadcast delivery into the wider 5G ecosystem. It enables direct reception on connected devices, including smartphones and vehicles, without requiring SIM cards, mobile subscriptions, individual authentication or mobile data consumption, while preserving the free-to-air and universal-access principles of terrestrial broadcasting.

This makes 5G Broadcast the practical bridge between audiovisual policy and digital infrastructure policy. It can deliver trusted European content, live events, emergency information and other downlink-only services with predictable quality of service, no buffering and no capacity degradation when audiences scale.

From a European policy perspective, 5G Broadcast supports several strategic objectives simultaneously and should therefore be explicitly recognised in the RSPG's practical recommendations.

First, it strengthens universal access to audiovisual content by enabling efficient distribution of live and on-demand media services to large audiences, including younger audiences who increasingly expect reception on mobile devices.

Second, it contributes to European cultural and technological sovereignty by creating a European platform for large-scale media and data distribution based on open standards, European infrastructure and a regulated environment that avoids undue dependence and control on platform gatekeepers.

Third, it substantially improves resilience. Unlike conventional cellular networks, broadcast delivery does not suffer capacity degradation as the number of users increases. This characteristic becomes particularly important during emergencies, natural disasters and major public events, when mobile networks may be congested, degraded or unavailable.

Finally, 5G Broadcast is a credible platform for public warning and early-alert systems. The ability to reach very large populations simultaneously, without network congestion and without relying on individual network connections, creates capabilities that conventional mobile broadband architectures alone cannot replicate. For all these reasons, 5G Broadcast is a powerful argument for preserving the long-term availability of the 470-694 MHz band, including the 600 MHz range that is particularly relevant for future smartphone reception.

The key policy message is therefore simple: 5G Broadcast needs regulatory certainty before it can scale. Chipset and device integration, network investment and cross-border coordination will only materialise if Europe gives a clear signal that the UHF band will remain available for terrestrial broadcasting innovation over the long term.

3. No evidence to justify further regulatory consideration of the 470–694 MHz band

BNE respectfully invites the RSPG to support an approach whereby any further regulatory consideration concerning the future use of the 470–694 MHz band, including its broader social, cultural and economic implications, is informed by the outcome of the ongoing CEPT and RSPG workstreams relating to the sub-700 MHz band and takes place only once these activities have been completed and their findings properly assessed

The compromise reached at WRC-23 established a carefully balanced and forward-looking regulatory framework for the 470–694 MHz band. This framework increased flexibility for administrations wishing to explore complementary uses of the band while preserving broadcasting services, PMSE operations and the overall regulatory equilibrium achieved through many years of international negotiation. As such, it reflects a consensus that accommodates evolving spectrum needs without undermining the continued development of incumbent services and emerging broadcasting technologies.

Only a limited period has elapsed since that compromise was reached at WRC-23. The current framework already provides administrations with additional flexibility while maintaining the regulatory stability necessary for broadcasting, PMSE and future innovation. However, very little practical experience has yet been gained regarding the use and effectiveness of this flexibility. The priority should therefore be to assess its implementation and practical benefits before considering whether any further regulatory measures are necessary.

In parallel, several technical and policy activities are currently underway within CEPT and the RSPG to evaluate future scenarios for the sub-700 MHz band under the current framework established at WRC-23, including the recently introduced secondary mobile allocation in many CEPT countries. These activities are specifically intended to inform future decisions regarding the band and are expected to provide valuable information regarding actual spectrum demand, implementation experiences, coexistence possibilities, cross-border coordination aspects and the impact on incumbent services.

It is also noteworthy that, despite repeated calls for greater flexibility, limited evidence has so far been presented regarding the practical implementation of alternative uses under the framework established at WRC-23. At the same time, the potential costs of further reducing spectrum available for broadcasting are increasingly clear. Such an approach would create uncertainty for investment, weaken incentives for innovation and potentially constrain the deployment of 5G Broadcast, UHD and other technologies identified in the BNE Innovation Roadmap.

BNE further considers that any future discussions regarding the 470–694 MHz band should build upon the existing European harmonisation framework for broadcasting, PMSE and future broadcast-enabled technologies, including 5G Broadcast, pending the outcome of ongoing studies assessing the feasibility of alternative uses.

At a time when the European audiovisual ecosystem continues to invest significantly in DVB-T2 migration, UHD deployment and 5G Broadcast development, there is currently limited evidence demonstrating either that the flexibility introduced by WRC-23 is insufficient or that reopening the regulatory framework would generate benefits commensurate with the uncertainty and disruption that such a process could create.

BNE therefore considers that any further regulatory consideration of the 470–694 MHz band at this stage would be premature. The priority should be to fully evaluate the implementation and effectiveness of the framework agreed at WRC-23, together with the findings of the ongoing CEPT and RSPG work, before contemplating any future reassessment of the regulatory arrangements governing the band.

4. Conclusions

BNE welcomes the recognition of audiovisual media policy within the Draft Opinion and considers this an important step towards a more balanced and comprehensive approach to spectrum management.

The ongoing transition towards DVB-T2 and UHD and the development of 5G Broadcast, demonstrate that terrestrial broadcasting continues to evolve and innovate. In particular, 5G Broadcast offers a unique opportunity to combine the strengths of broadcasting with the broader 5G ecosystem while supporting European objectives relating to resilience, strategic autonomy, universal access to content, efficient use of infrastructure and public warning systems.

Against this background, consideration of possible regulatory actions concerning the 470–694 MHz band at WRC-31 would be premature. The current framework already provides flexibility, significant technical work remains ongoing, and the benefits of further regulatory change have not yet been adequately demonstrated.

BNE therefore respectfully urges the RSPG to:

1. Maintain and further strengthen the recognition of audiovisual media policy as a key EU policy objective in spectrum management decisions.
2. Recognise the strategic role of terrestrial broadcasting in strengthening European sovereignty, societal resilience and public safety, and ensure long-term regulatory certainty and continued access to the UHF band, as terrestrial networks remain the only platform capable of providing universal, free-to-air and highly resilient access to information for all citizens across most European countries.
3. Recognise the strategic importance of UHD and 5G Broadcast as key enablers of the future evolution of the UHF band, supporting innovation, spectrum efficiency, media resilience and the delivery of universally accessible audiovisual services across Europe.
4. Advocate for the removal from the WRC-31 agenda of any item that could lead to a regulatory reassessment of the 470–694 MHz band, noting that the framework established by Resolution 235 (Rev. WRC-23) has not yet been fully implemented, assessed or demonstrated to be insufficient.
5. Ensure that any European position for WRC-27 and beyond preserves long-term access to the 470–694 MHz band, including the 600 MHz range, enabling the continued development of DTT, UHD and 5G Broadcast services, supporting device integration, public warning capabilities, and future broadcasting innovation across Europe.

Annex: Examples of Innovation and Emerging Use Cases in the 470–694 MHz Band

SPAIN: UHD as a demonstration of ongoing broadcast innovation

Spain provides a compelling example of how terrestrial broadcasting continues to innovate and evolve. DTT remains the leading audiovisual platform in the country, reaching approximately 47 million unique viewers every year and around 27 million viewers on a daily basis. The platform supports a highly diverse audiovisual ecosystem, including more than 25 national television services, over 40 regional services and hundreds of local channels.

Recent free-to-air UHD broadcasts of the 2026 FIFA World Cup further demonstrated the capacity of terrestrial broadcasting to deliver premium audiovisual experiences at national scale. The 2026 World Cup Final attracted more than 20 million unique viewers in Spain, achieved an average audience of 15.7 million viewers and reached peak audiences exceeding 17 million viewers, all while delivering the highest standards of picture quality currently available to viewers.

These results confirm both the continuing relevance of free-to-air television and the ability of terrestrial broadcasting networks to evolve technologically while preserving their unique public value: universal access, mass reach, spectrum efficiency and resilience. Far from being a legacy platform, terrestrial broadcasting continues to modernise through the deployment of DVB-T2, UHD services and other innovations designed to enhance the viewing experience and maximise the efficient use of spectrum resources.

This process of technological evolution is continuing. On 5 November 2026, two additional UHD television services are scheduled to be launched in Spain, further expanding the availability of UHD content on the DTT platform. These new launches demonstrate the ongoing commitment of the Spanish audiovisual ecosystem to invest in innovation and improve service quality for viewers. They also provide tangible evidence that the terrestrial broadcasting ecosystem continues to develop new services and create value for citizens, reinforcing the importance of maintaining a stable and predictable regulatory framework for the 470-694 MHz band.

France and the deployment of 5G Broadcast

France has become Europe's leading pioneer in the practical deployment of 5G Broadcast, with the engagement of a large-scale pilot deployment by TDF starting in 2026 and reaching 429 sites and 40 M inhabitants end 2028.

The French ecosystem associating public service media and early adopter commercial TV editors has moved beyond laboratory testing and is actively investigating scenarios that integrate traditional broadcasting and 5G Broadcast within the same UHF spectrum environment.

Key use cases under consideration include:

- Television reception on smartphones.
- Efficient distribution of premium live content.
- Public warning services.
- Mobility and automotive applications.
- Reduction of network congestion during high-demand events.

Estonia and the Pocket Siren project

Estonia has emerged as one of Europe's most innovative users of 5G Broadcast through the development of the Pocket Siren project.

Pocket Siren uses 5G Broadcast to deliver emergency alerts and public warning messages directly to users. Unlike traditional cellular approaches, the system can simultaneously reach very large populations without creating congestion in mobile networks.

The project illustrates how the future value of the UHF band extends beyond audiovisual distribution. It can also support national resilience policies, civil protection strategies and emergency communications.

Pocket Siren demonstrates the unique capability of broadcast-based technologies to provide reliable population-wide communications during crises, highlighting the strategic importance of preserving spectrum resources capable of supporting future 5G Broadcast deployments across Europe.