

BNE contribution to the European Commission call for evidence on the EU Position for World Radiocommunication Conference 2027

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Scope	WRC-27 Preliminary Agenda Item 2.14 and Resolution 235 (Rev. WRC-23), concerning the future use of the 470–694 MHz band

Executive summary

BNE's central recommendation is that the EU position for WRC-27 should preserve long-term regulatory certainty and continued access to the 470–694 MHz band for terrestrial broadcasting, including the spectrum needed for DTT, UHD, 5G Broadcast and programme-making and special events applications. The EU should oppose the inclusion in the WRC-31 agenda of any item that would prematurely reopen the regulatory framework for this band.

- Resolution 235 (Rev. WRC-23) is a recent and carefully balanced outcome. It should be implemented and evaluated before further regulatory change is considered.
- The ongoing CEPT and RSPG work on the sub-700 MHz band should be completed and properly assessed before the EU supports any new international studies or agenda item.
- EU spectrum policy should treat audiovisual media policy, media pluralism, universal access, cultural diversity, resilience, public safety and strategic autonomy as substantive objectives, not as secondary considerations.
- DVB-T2, UHD and 5G Broadcast show that terrestrial broadcasting is an evolving innovation platform. Investment and device integration require a credible long-term spectrum horizon.
- Any future assessment should be evidence-based and include the full social, cultural, security and economic costs and benefits, not only projected mobile broadband demand.

About BNE

Broadcast Networks Europe represents terrestrial broadcast network operators in Europe and internationally. Its members manage and maintain infrastructure and provide network design, multiplexing, distribution, transmission and carriage services that enable television, radio and other over-the-air services to reach their audiences.

1. Relevance to the Commission initiative

BNE welcomes the Commission's call for evidence ahead of the planned proposal for a Council decision establishing the EU position for WRC-27. BNE supports an EU approach that is coordinated, evidence-based and consistent with the Union's wider legal and policy objectives.

BNE represents operators of terrestrial broadcasting networks across Europe. These networks provide universal access to audiovisual media services, support media pluralism and cultural and linguistic diversity, and contribute to the resilience of Europe's communications ecosystem. They are also evolving through DVB-T2, UHD and 5G Broadcast.

This contribution focuses on Preliminary Agenda Item 2.14 for WRC-27 and Resolution 235 (Rev. WRC-23), because decisions on a possible WRC-31 agenda item could have significant consequences for the long-term future of the 470–694 MHz band in Europe.

2. Recommended EU position on Preliminary Agenda Item 2.14

The EU should not support a WRC-31 agenda item that could lead to a new regulatory reassessment of the 470–694 MHz band. Such a step would be premature for four reasons:

- The WRC-23 framework has only recently been agreed, the associated toolbox will be defined after WRC-27 and will not have generated sufficient implementation experience by WRC-31.
- The current framework already provides additional flexibility for administrations while preserving broadcasting, PMSE and the broader regulatory balance.
- Relevant technical and policy work is still under way in CEPT and the RSPG, including assessment of demand, coexistence, coordination and impacts on incumbent services.
- No robust evidence has been presented that the WRC-23 framework is insufficient or that a further change would deliver benefits proportionate to the uncertainty and disruption created.

Accordingly, BNE recommends that the EU advocate removal from the WRC-31 agenda of any item that would entertain diverging speculations on future regulatory arrangements for the band, and therefore discourage cooperation. To the contrary, the coming years require, as concluded by the Commission, *"intensive cooperation and preparatory work by Member States and the Commission for the post-2030 period"* which requires stability in the framework.

3. The 470–694 MHz band supports multiple EU public-policy objectives

Audiovisual policy, pluralism and universal access

Spectrum decisions concerning the UHF band cannot be assessed solely through connectivity metrics. Terrestrial broadcasting supports freedom of expression and information, media pluralism, cultural and linguistic diversity, democratic participation and universal access to trusted content. Free-to-air reception is available irrespective of income, geography, mobile subscription or broadband connectivity. This dimension is recognized in the conclusion of the Commission's report COM(2026)385 *"the sub-700 MHz band continues to underpin both digital terrestrial broadcasting and audio PMSE applications, which play vital roles in supporting cultural diversity, media pluralism and live content production."*

Resilience, public safety and sovereignty

Broadcast networks can reach very large audiences simultaneously and do not suffer capacity degradation as the audience grows. This makes them an important complement to individual, point-to-point networks during emergencies, major public events, power disruptions, congestion or service degradation. Maintaining European-controlled, open-standard distribution infrastructure also supports strategic autonomy and reduces dependence on platform gatekeepers.

Efficient use of infrastructure and spectrum

One-to-many delivery is particularly efficient for popular live and linear content. It distributes the same content to millions of users without replicating a separate stream for each viewer. Policy assessment should therefore consider overall network and energy efficiency, scalability and avoided duplication of capacity across delivery platforms.

4. Innovation requires long-term certainty

DVB-T2 and UHD

The transition to DVB-T2 increases spectrum efficiency and supports higher-quality services, including UHD. It demonstrates that terrestrial television is not a static legacy platform but an infrastructure capable of continuing technological evolution while maintaining universal availability.

5G Broadcast

5G Broadcast brings one-to-many delivery into the 3GPP ecosystem. It can enable direct reception on connected devices, including smartphones and vehicles, without a SIM card, mobile subscription, individual authentication or mobile data consumption. Potential uses include live audiovisual services, public warning, emergency information, mobility and efficient mass distribution of data.

Its development depends on chipset and device integration, network investment and cross-border coordination. These will not materialise at scale if spectrum policy creates uncertainty over the long-term availability of the UHF band, particularly the 600 MHz range relevant to future portable and mobile reception.

5. Evidence and assessment principles

If the Commission considers future policy options affecting the 470–694 MHz band, BNE recommends applying the following principles:

- Complete the ongoing CEPT and RSPG work before drawing conclusions or supporting new international studies.
- Assess actual implementation of the flexibility introduced at WRC-23, rather than relying on hypothetical demand.
- Apply a comprehensive cost-benefit analysis covering audiovisual policy, citizens, public-service media, commercial broadcasters, network operators, PMSE users, equipment ecosystems and Member States.
- Include transition costs, consumer equipment replacement, cross-border coordination, interference management, loss of universal coverage and impacts on resilience and emergency communications.
- Compare realistic alternative scenarios, including continued broadcasting innovation, rather than assuming reallocation as the baseline.

- Ensure technological neutrality while recognising the distinct public value and network economics of one-to-many delivery.
- Avoid decisions that strand investments or create regulatory uncertainty before existing frameworks have been implemented and evaluated.

6. Concrete recommendations for the EU position

- Reaffirm continued, long-term access to the 470–694 MHz band for terrestrial broadcasting, PMSE and future broadcast-enabled technologies well beyond 2030.
- Recognise audiovisual media policy as a core spectrum-policy objective alongside connectivity, transport, space and other Union priorities.
- Recognise DTT, DVB-T2, UHD and 5G Broadcast as strategic components of Europe’s media, resilience and public-warning capabilities.
- Oppose a WRC-31 agenda item calling for a premature review of the 470–694 MHz band and seek removal of such an item from the agenda.
- Base any later review on completed CEPT and RSPG evidence, practical implementation experience and a transparent, multidimensional cost-benefit analysis.
- Preserve the 600 MHz range for the continued development of portable and mobile broadcast reception and the 5G Broadcast ecosystem.
- Avoid international positions that would prejudge future EU audiovisual, resilience, cultural or industrial policy choices.

Conclusion

The EU enters the WRC-27 process with a balanced framework for the 470–694 MHz band that was agreed only at WRC-23. The priority should be implementation, evidence gathering and innovation, not another cycle of regulatory uncertainty. A clear EU position protecting long-term access to the band will support investment in DVB-T2, UHD and 5G Broadcast and will safeguard universal access, media pluralism, resilience, public safety and European strategic autonomy.