

AER response to RSPG public consultation

Draft RSPG Report “Assessment of future usage of the frequency band 470-694 MHz within the EU”

The Association of European Radios (AER), representing commercial radio across Europe, welcomes the opportunity to comment on the important Draft RSPG Report on the future use of the 470–694 MHz band.

The importance of spectrum for radio

While television and PMSE are the primary users of this band today, spectrum policy decisions for the frequency band 470–694 MHz have direct consequences for the wider broadcasting ecosystem, including radio. **Allocating the 470–694 MHz band for co-primary use with mobile services would seriously endanger radio’s future from an economic and infrastructural standpoint. Radio broadcasters frequently share large parts of the broadcast network infrastructure with terrestrial TV; if TV loses access to this spectrum, the shared cost burden would shift entirely to radio, which most could not afford.** This could force many radio stations to shut down, drastically reducing the diversity and reach of radio. In addition, **studies confirmed by experience in the field¹ have shown that broadcasting services and mobile services cannot operate on the same frequencies either in the same area or in adjacent areas without causing unavoidable harmful interference.** Mobile broadband, however, as it is not a native broadcast-technology, cannot become an adequate substitute for universal free-to-air terrestrial TV and radio distribution, since the roll-out of mobile networks, especially in rural areas with low population densities, is not economically viable and is very unlikely that it will provide universal and free of charge services. Allocating the 470–694 MHz band to mobile would harm households and society by degrading quality media distribution, offering little to no improvement in mobile broadband coverage or quality. Unlike broadcasting, mobile broadband cannot guarantee universal, reliable, and free access, threatening radio’s core public value contribution to millions. **Radio continues to reach millions of European citizens every week, ensuring free-to-air access to trusted information, entertainment, and emergency alerts.** Affordable, interference-free spectrum is essential to sustaining media pluralism, cultural diversity, and trusted content.

Future-proofing radio: 5G Broadcast

Emerging technologies like 5G broadcast could enable unprecedented radio and TV consumption on mobile devices, providing high-quality access to the full range of radio programmes anywhere, on any device, at no access or broadband cost. **It is technically feasible to deploy the 5G Broadcast standard in the 470–694 MHz band without causing interference or requiring changes to the current regulation. As no alternative spectrum frequencies are available** for audiovisual broadcasting and would provide comparable propagation characteristics, coverage, and compatibility for linear broadcast content delivery to mobile devices, it is imperative that the 470–694 MHz band continues to be exclusively allocated to broadcast transmissions in the long term. In times of crisis and rampant disinformation, radio and TV’s role as trusted sources of news becomes even more vital. 5G broadcast will further enhance broadcasters’ public value contribution by ensuring the delivery of reliable, diverse, and lifesaving safety information, helping preserve a well-functioning society.²

¹ [Report ITU-R BT.2337 “Sharing and compatibility studies between digital terrestrial television broadcasting and terrestrial mobile broadband applications, including IMT, in the frequency band 470-694/698 MHz” 10;](#)
[Report ITU-R BT.2301 “National field reports on the introduction of IMT in the bands with co-primary allocation to the broadcasting and the mobile services”.](#)

² AER [“5G Broadcast for Radio: Securing future-proof, diverse and free-of-charge radio access on all platforms and all mobile devices”](#)

Social, cultural and democratic value

We strongly agree with the statement in the draft report that “*Decisions made in the coming years will determine not only the use of the 470–694 MHz band but also how Europe aligns its digital leadership ambitions with its longstanding commitments to public service and cultural resilience.*” This principle is particularly relevant for radio, which is Europe’s most trusted medium and a cornerstone of democratic information and debate. Decisions on the band must therefore consider not just technical efficiency, but also the wider cultural, social, and democratic impacts, in line with Article 7 of the UHF Decision (EU) 2017/899 and the EU’s position for WRC-23.

Need for long-term certainty

Commercial radio, together with TV and PMSE, forms part of and supports Europe’s creative and content industry, contributing significantly to economic value and employment. AER stresses that the 470–694 MHz band must remain exclusively allocated to broadcasting and cultural uses well beyond 2030. **Long-term certainty is indispensable** for broadcasters to continue investing in content, innovation, and distribution. Commercial broadcasters depend on stable access to spectrum to remain competitive against global online platforms, ensuring diversity of voices and sustainability of the European media model.

Emergency communications and consumer access

Radio is indispensable in times of crisis and for mobility. Spectrum policy should guarantee that citizens continue to have universal, free access to trusted information via broadcast channels. In emergency and disaster situations, **broadcast infrastructures remain the most reliable means of reaching the entire population simultaneously, without risk of network congestion or failure.**

Conclusion

The 470-694 MHz band is essential to secure European content creation, production, and delivery through broadcasting and PMSE, for the benefit of all users – viewers and listeners. Qualified and local employment is fostered. Moreover, the current spectrum allocation supports a democratic and safer Europe, by ensuring quality news, pluralism, and freedom of speech through trusted and regulated media, available free-to-air, and through local events and debates.

AER therefore calls on EU regulators to preserve this band exclusively for broadcasting and PMSE well beyond 2030, ensuring a strong, pluralistic, and competitive European media landscape.

About AER: [AER - the Association of European Radios](#), is the voice of commercial radios in Brussels.
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